May Meeting Notes 2025
05/22/2025

Statewide Longitudinal Data System (SLDS)

Meeting video

Type of Meeting	***Sustainability Advisory Group***
Facilitator:	Katherine Hochevar
Note Taker:	AI assisted note taking
Timekeeper	Heather MacGillivary
Attendees:	Katherine Hochevar, Soumanetra Ghosh, Danielle Ongart, Stephanie Stout-Oswald, Michael Vente, Jenna Zerylnick
	Absent: Amanda Neal, Jess Kostelnik,

Agenda Items

- Welcome & Roll Call (5 mins)
- Group Updates (5 mins)
  - Governance Board Meeting
  - Build & Implementation Meeting
- Data Governance (45 mins)
  - Policies and Procedures Review
    - Sections 4, 7 and 10
    - Use Case Review Process
- Future Meetings (5 mins)

Open

Call to Order

- Roll Call was taken, Quorum was reached
- Agenda and Objectives reviewed

Announcements & Updates

Group Updates: Heather provided updates from the build and implementation advisory group, which is also reviewing policies and procedures. Key decisions from that group include:

- Defining legal counsel more clearly.
- Adding three more training sessions to support SLDS users.
- Removing archiving references.
- Implementing multi-factor authentication throughout the document.
- Adding specificity to audit requirements.

- Recommending column and row-level security.

These changes are actively being implemented, and a clean version of the document will be provided for further feedback.

General SLDS Updates:

- The governing board met on May 16th, and their next meeting is rescheduled to June 27th for better attendance.
- The top two tiers of the legal framework (MOU and DSA template) have been substantially agreed upon, pending the final policies and procedures.
- An OIT data architect was hired and started on May 19th.
- Review of proposals for the SLDS system build RFP continues, with an expected selection and contract date of July 25th.
- House Bill 251308 is awaiting the governor's signature, setting a new due date of September 2026 for the first annual report.
- Branding efforts have begun, with a cross-agency marketing group agreeing to use Colorado's branding guidelines.

New Business

Data Governance Policies and Procedures Review: The group reviewed sections 4, 7, and 10 of the data governance policies. The approach to policies in Phase 1 of SLDS is to keep them "light to launch" to facilitate data flow and meet the September 2026 deliverable, while being scalable for future additions. External researcher access, for example, is deferred to approximately 2027. The target for document finalization is June 27th, with national experts and advisory groups providing review.

Key Changes and Discussions Since May 8th:

- **Role Definitions:** Revised to align with GDAB (Government Data Advisory Board).
- **Legal Counsel Clarity:** Added to role definitions, still open for review.
- **Use Case Criteria:** Added "level of effort," "value add," and "lack of duplication" to the criteria for use cases.
- **Data Owner Concept:** Shifted away from "data owner" to **"data provider"** and **"data steward."**
- **Legal Review for Use Cases:** A significant discussion point was whether legal review is required for all use cases. While some organizations do not conduct legal review for every research request, the Colorado Department of Education (CDE) requires legal review for any request involving FERPA-protected student PII due to specific written agreement requirements defined by federal and state laws and regulations. The group decided to put a pin in this discussion to allow for more homework and a deeper dive with Katie Nelson (legal counsel) and CDE representatives to ensure the legal framework can accommodate these needs. The current understanding is that legal review for use cases can be at the discretion of the data provider, especially when PII is involved, but the exact process and documentation still need to be ironed out.

Issues to Resolve in Section 4:

- **Communication of Reports:** It was suggested that **data providers** communicate with district schools and IHEs about upcoming reports and user acceptance testing (UAT) opportunities through their existing channels. This suggestion was generally accepted, with CDE confirming they could follow their normal processes for data releases.
- **Resolving Objections to Publication:** The discussion centered on who resolves objections to report publication, particularly if the report is legal but undesirable.
    - If an objection is based on **legal** concerns, the agency whose privacy laws would be violated has the right to veto publication (e.g., CDE for FERPA violations if data suppression levels are too low).
    - For **non-legal** objections, the group discussed whether the **governance board** should resolve these. There was a desire for more touchpoints and approval in the initial phases to build trust, especially for statutory annual reports. It was tentatively agreed that the governance board would have final approval of the **statutory annual reports** as the primary deliverables for the first phase, with flexibility for future reports.

Data Remediation (Section 7): The group discussed what happens when data elements ingested into the SLDS change or are eliminated due to changes in state or federal statutes (e.g., a program is eliminated or a data field changes format).

- Suggestions included regular scheduled reviews (e.g., quarterly) for data providers to update on changes.
- Another suggestion was for SLDS staff to co-construct data element changes with agencies to ensure mutual benefit and maintain established reporting.
- It was emphasized that major changes to data elements, especially those impacting what data can be shared, should adhere to the **ingestion calendar** and **Data Sharing Agreements (DSAs)**. Proactive planning and awareness

of these changes are crucial. Josh Williams suggested that these are implementation details that should be handled at a programmatic level, with governance focusing on adherence to the DSAs.

Training and Awareness (Section 10): This section, in its entirety, is open for review and comments.

Based on the meeting summary, here are the **key decisions** made or agreed upon:

- **Legal Review of Use Cases:** While the discussion remains open for a deeper dive, the initial stance is that legal review is *not required for all use cases*, but rather at the discretion of the data provider (e.g., an agency's data steward or other subject matter expert would flag when legal counsel is needed, particularly for "yellow light" scenarios where they are unsure, or when PII is involved). This approach aligns with the idea that the advisory group members do not have expertise in all relevant data privacy laws.
- **Resolution of Non-Legal Objections to Report Publication:** For objections to a report's publication that are *not* legal in nature (i.e., if it's legal but "not desirable"), the **governance board will resolve these objections.**
- **Approval of Statutory Annual Reports:** For the initial phase, particularly the first statutory annual reports, the **governance board will have final approval** before their release. This approach is seen as a way to build trust and ensure alignment in the early stages of SLDS implementation, with the understanding that this process might evolve for future, non-statutory reports.
- **Communication of Upcoming Reports and UAT: Data providers will communicate with district, schools and IHEs** about upcoming reports that include school-level data and opportunities for User Acceptance Testing (UAT) through their existing communication channels.
- **Data Element Changes and Remediation:** While specific cadences are implementation details, the governance policy will emphasize **adherence to the published ingestion calendar and Data Sharing Addenda to the Data Sharing Agreements** which define the data elements. Changes to data elements (adding or removing) should go through a data sharing agreement amendment process.
- **Reframing of "Data Owner":** The group unanimously agreed to move away from the term "data owner" and instead focus on **"data provider" and "data steward"** in the policy documents, aligning with GDAB definitions.
- **Added Use Case Criteria:** Initial criteria for use cases were tentatively agreed upon and added: "level of effort," "value add," and "lack of duplication," in addition to the existing "germane to mission, quality, methodologically sound, ethical, and legal."

Future Meeting Length and Cadence

- June 5, 2025 & June 26, 2025

Close

- Recap Action Items
  - **Homework for the Group:** Review and comment on the revised policy document. A new, revised version will be sent out with the meeting notes next week.
  - **Homework for Program Manager:** Changes will be made based on key decisions. Reschedule June 19th meeting.
- Next Month's Agenda
  - The goal for document finalization remains June 27th.
  - The June 19th meeting, which falls on a holiday, needs to be rescheduled. Options given were June 12th or June 26th, with attendees voting in the chat. June 26th was selected
  - The next scheduled meeting is June 5th at 11 AM, with another meeting planned before the final submission to the governing board. The majority of the advisory group members confirmed attendance at the July 3rd meeting.
  - **Focus of the Next Meeting:** The next meeting will focus on Sections 10 and Section 3 (revised).
- Adjourn Public Meeting