# Data Governance Policy: Examples from Open Data Programs

Although open data programs emphasize the importance of data publication, they require excellent data governance structures to ensure that the data which is published meets high standards (e.g., quality good enough to meet public scrutiny, sufficient legal review to ensure that the city incurs no liability, etc.). For that reason, open data programs provide a good basis for exploring models of public data governance. The following examples demonstrate several models for structuring data governance programs and committees, but also include policy direction on committee membership, roles and responsibilities, and the purpose of creating this type of governing body.

One popular approach focuses on the role of the Chief Data Officer as an individual empowered to improve the city’s data publication processes. The CDO and department designees are charged with specific data management responsibilities. (Key roles are highlighted in yellow.)

## Kansas City, MO, Code of Ordinances

### Sec. 2-2133. - Governance.

*The city manager shall designate a chief data officer who shall oversee the open data process, including:*

1. *Managing the open data portal;*
2. *Identifying a designee for each department who will be responsible for managing the collection and release of data which, in coordination with the chief data officer, shall be prioritized based on the goals established by the city's performance management initiative, frequency of public records requests, and additional signals of interest from the public;*
3. *Working with each agency to identify a designee who will be responsible for managing the collection and release of data which, in coordination with the chief data officer, shall be prioritized based on the goals established by the city's performance management initiative, frequency of public records requests, and additional signals of interest from the public;*
4. *Developing and implementing a process for identifying the relative level of risk and public benefit associated with potentially sensitive and protected information, and recommending which public data should not be published online;*
5. *Overseeing the creation of a comprehensive inventory of datasets held by each department and agency which is published to the open data portal and regularly updated;*
6. *Establishing processes for optimizing methods of data collection, as well as publishing datasets and creation processes to the open data portal, including processes for ensuring that datasets contain unique identifiers and are reviewed for use-appropriate formats, quality, timeliness, and exclusion of sensitive and protected information; and that data published is complete, reliable, highly detailed, and presented in a way that maximizes public connectivity;*
7. *Maintaining written justification for why certain information is not published online; and*
8. *Establishing timelines, in coordination with departmental designees, for publishing public data on the open data portal.*

(Ord. No. [150865](https://www.municode.com/library/mo/kansas_city/ordinances/code_of_ordinances?nodeId=740307) , § 1, 10-22-15)

A similar, central oversight and management role can be played by the Chief Information Officer as well. Other existing departments may be called on to play a regular implementation role.

## San Francisco Bay Area Rapid Transit Open Data Policy

### Section 3: Governance

*1. Implementation of this Open Data Initiative Resolution will be overseen by the Office of the Chief Information Officer.*

*2. The Office of the Chief Information Officer shall work with all departments within the District to:*

*a. Identify a lead open data coordinator within each department. The coordinator will be responsible for oversight and management of that department's participation in the Open Data Initiative, including requests for budget or resources to support that participation;*

*b. Develop a comprehensive inventory of datasets held by each District department;*

*c. Develop and implement a process for determining whether information is private, sensitive or otherwise protected and establish whether the information may be published; the relative level of risk and public benefit associated with potentially sensitive, non-protected information so as to make a determination about whether and how to publish it;*

*d. Work with the Office of the General Counsel to determine if the information identified by the departments may, legally, be made publically available;*

*e. Develop and implement a process for prioritizing the release of datasets to the Open Data Portal, including historic and archival material, which takes into account new and existing signals of interest from the public (such as the frequency of Public Information Act requests), the District's programmatic priorities, existing opportunities for data use in the public interest, and cost;*

*f. Establish processes for publishing datasets to the Open Data Portal, including processes for ensuring that datasets are reviewed for use-appropriate formats, quality, timeliness, and exclusion of protected and sensitive information;*

*g. Optimize the quality and timeliness of data collection to avoid the inefficiencies created by paper-based systems and allow structured data to be created in the natural course of business;*

*h. Develop and oversee a routinely updated, public timeline for new dataset publication; and*

*i. Ensure that published datasets are available for bulk download or via APIs, or Application Programming Interfaces, to enable search and retrieval.*

*3. To ensure that the commitments and goals as set forth in this Resolution are met, the Office of the Chief Information Officer will actively encourage department and public participation by providing regular opportunities for feedback and collaboration.*

(SF BART’s Entire [Open Data Policy](https://www.bart.gov/sites/default/files/docs/BART_OPEN_DATA_POLICY_FINAL.pdf))

A lightweight approach to data governance involves creating a governance committee that is charged with a clear set of data management responsibilities.

## City of Lincoln, NE 2016 Council Resolution

### Open Data Initiative

*… 4) Identify appropriate City Representatives who shall comprise an Open Data Governance Committee of City representatives and, to the extent practical and financially feasible:*

*A. Encourage city departments to collaborate and to oversee execution and implementation of the Open Data Initiative;*

*B. Identify existing and potential datasets for release as part of the Open Data Initiative and work periodically with Information Services and City departments to plan and develop of new datasets, review existing datasets, set Open Data Initiative priorities, prioritize data releases, recommend appropriate citation forms; maintain descriptors that define the published data; publish datasets; and release datasets online to the public where data/information in hard copy (printed reports, posters, brochures, etc.) or soft copy (PDF, web content, etc.) has already been released to the public, including any available public feed;*

*C. Plan, implement, update, and identify metrics and measures of current datasets when planning the creation of new datasets/databases or scheduling technology enhancements;*

*D. Appropriately safeguard sensitive information;*

*E. Incorporate public perspectives into policy implementation through channels such as the Taking Charge survey or an online Open Data survey portal;*

*F. Shall annually submit on or before July 1 of each year an Open Data Initiative progress report with accompanying recommendations to the Mayor and City Council.*

*G. Ensure information at the City is managed in ways that assist in creating a culture of Open Government and information sharing by providing open data governance and oversight;*

*H. Provide support to develop awareness and training programs to help City staff incorporate Open Data practices into their business planning processes;*

*I. Promote information transparency and accountability to build trust and confidence in government and foster Open Government leadership in recognition of the evolving democratic process.*

For more comprehensive approaches to data management (including lists of specific policies already in use), explore policies of two substantial municipal data programs:

* City of Boston, MA
  + [Open and Protected Data Policy](https://data.cityofboston.gov/City-Services/Open-and-Protected-Data-Policy/2rjs-rb6r)
* City of San Francisco, CA
  + [DataSF 2016-17 Strategic Plan: Unleashing the Power of Data](https://docs.google.com/document/d/1cVqhRQXq5LJ7XQtA-OjmEXe6penlqI6DY8mY84_wlb0/edit)