

# Consumer Financial Protection Bureau

## Data Governance Board Charter

### I. Purpose of the Data Governance Board

The ability to intake, analyze and publicly release information is fundamental to the Consumer Financial Protection Bureau's mission. The Consumer Financial Protection Bureau's (CPFB or Bureau) Data Governance Board ("DGB") is a committee chaired by the Chief Data Officer (CDO).<sup>1</sup> The DGB has responsibility for assessing the benefits and risks associated with managing the Bureau's data. The DGB will advise the CDO on decisions regarding intake, management, disclosure, and disposition of data in accordance with Bureau policies. The DGB is established in accordance with the *Policy on Information Governance*.

### II. Membership

#### A. Members

The DGB will consist of members from the following Divisions and Offices:

1. The CDO, Chair of the DGB
2. A representative from the CDO Policy Team
3. A representative from the Office of Consumer Response
4. A representative from the Consumer Education and Engagement Division
5. A representative from the Supervision, Enforcement and Fair Lending Division
6. A representative from the Research, Markets and Regulations Division
7. A representative from the Privacy Team
8. A representative from the Cybersecurity Team
9. A representative from the Legal Division
10. A representative from the External Affairs Division
11. A representative from the Office of the Director
12. A representative from the Operations Division Front Office

#### B. Delegates

DGB members may, as needed, send a delegate to a meeting in their place. Delegates of members will have the same authority as the member they are representing. The DGB may

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<sup>1</sup> Per the *Policy on Information Governance*, the Chief Information Officer (CIO) may for operational purposes, and at his/her discretion, delegate information governance oversight authority to individuals or to operational committees. The CIO has delegated the authority to chair the DGB to the CDO. The CIO may still exercise his/her information governance oversight authority at his/her discretion.

invite other attendees to attend meetings or engage on topics of interest, as they deem appropriate.

### C. Membership Selection

The members shall be identified by the senior leadership in the areas identified in Section 1.B. It is ideal for members to have the ability to weigh in on substantive information governance issues and to have knowledge of the related issues for their Office or Division. Leadership may change their choice of appointed representative at any time by notifying the CDO Policy Team.

## III. Meeting Support and Facilitation

The Data Policy Team is responsible for:

- Scheduling and facilitating regular meetings
- Planning meeting agendas
- Compiling and sharing materials for DIG member review, prior to the meeting
- Facilitating the collection and submission of recommendations to the CDO
- Facilitating the escalation of appropriate issues to the DGB, as necessary
- Recording all decisions, and
- Maintaining relevant DGB documentation (e.g. meeting presentations, minutes, recommendations) in a central location

## IV. Responsibilities of the DGB

Facilitated by the Data Policy Team, it is the role of the DGB is to advise the CDO on any decisions regarding information governance. The responsibilities of the DGB include, but are not limited to, advising the CDO in making the following decisions:

- Determining whether given information should be brought into the Bureau or released by the Bureau, where the Data Intake Group or Data Release Group elevates a request to the DGB
- Developing and implementing sensitivity leveling standards for managing Bureau information
- Reviewing and approving certain information governance standards
- Reviewing and approving decisions to delegate authority to individuals or committees
- Reviewing summaries of work conducted by delegated authorities
- Reviewing policy exceptions
- Advising the CDO on general information governance related issues
- Providing timely review, feedback and recommendations of issues brought before the DGB.

## V. DGB Process & Authorities

### A. Meeting Schedule

The DGB will generally meet no less than once every two months. Meetings shall be held at a time convenient to as many members as possible.

### B. Advising the CDO

The DGB is responsible for advising the CDO on all parts of the *Policy on Information Governance*, along with certain required consultations as enumerated below.

### C. Required Consultations on Certain Decisions

Certain decisions as described below will require either post-hoc or ante-hoc consultation with the DGB.

#### 1. Reviewing Decisions Prior to CDO Approval

While final authority for the decisions below lies with the CDO, the decisions below shall generally be reviewed with the DGB prior to the CDO making a decision. The CDO may bypass this requirement in extraordinary circumstances (e.g., when timelines do not permit ante-hoc review), but will still ensure post-hoc review in cases where review prior to the decision is not reasonably possible.

- a) **Delegation of Authority.** Any and all authorities contained in the *Policy on Information Governance*, may be further delegated to any individual or operational committees. The CDO shall consult with the DGB on decisions to delegate authority prior to finalizing any formal delegation.
- b) **Review and Approval of Data Governance Standards or Governance Body Charters.** The CDO has the authority to approve or reject any Bureau Data Governance Standards and to charter new Bureau governance bodies. The CDO shall review any Bureau Data Governance Standard or charter with the DGB prior to the CDO approving or rejecting the Standard or charter.
- c) **Bureau-wide Policy Exceptions.** The CDO may approve exceptions to the aforementioned policy as appropriate. The DGB shall review Bureau-wide policy exceptions granted by the CDO. This review is not required for limited exceptions that may impact only a single dataset or a single user or small group of users.

#### 2. Oversight of Delegated Decisions

Summaries of major data-related information management processes and practices made by delegated authorities shall be reviewed by the DGB at year-end. Divisions or Offices with a delegated authority may seek assistance from the Data Policy Team, the DGB or the CDO should any questions arise. The DGB may set guidelines around what constitutes a “major data-related decision” for the purposes of this requirement. Examples may include, but are not limited to, revising existing Standards, intaking new datasets, managing access controls, and data disclosure processes.

Each individual or committee with delegated authority shall provide information to the DGB summarizing major data-related information management processes and practices which the individual or committee has undertaken. The DGB will prescribe the frequency and format by which the decisions will be reviewed.

The DGB will not have authority to overturn any of the decisions made by delegated authorities, but may use the information reviewed to inform recommendations to the CIO or CDO as to the scope of the delegations or changes to future delegated information management processes and practices.

#### **D. Documentation**

The CDO Policy team will maintain and circulate, as needed, documentation about Data Governance Board decisions. This includes recommendations to the CIO or CDO about approving or rejecting proposed delegations of authority, new Standards, and exceptions to the *Policy on Information Governance*.

#### **VI. Revision History**

Action	Date	Approval Authority
Initial version	July 29, 2014	Ashwin Vasan, CIO
Second version	November 14, 2017	Jerry Horton, CIO

#### **VII. CIO Signature and Effective Date**

Approved: \_\_\_\_\_

Date: 1 May 2018

  
Jerry Horton, Chief Information Officer

This Charter will become effective when signed.