Data Governance Policy

Federal Retirement Thrift Investment Board

Effective Date: December 31, 2022

Data Governance Policy

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1. Overview

The Federal Employees' Retirement System Act of 1986 (FERSA) authorized the Federal Retirement Thrift Investment Board (FRTIB), an independent agency of the U.S. Executive Branch, to administer the Thrift Savings Plan (TSP), one of the three components of the Federal Employees' Retirement System (FERS). The TSP is a defined contribution plan for U.S. Federal civilian employees (including those covered by the Civil Service Retirement System) as well as members of the uniformed services. FRTIB and TSP are collectively referred to as the Agency. The mission of FRTIB is to administer the TSP solely in the interest of its participants and beneficiaries.

Office of Planning and Risk (OPR) provides leadership and support to the FRTIB and its stakeholders on all strategic planning matters from data/predictive inputs to envisioning and further through implementation, measurement, and continuous improvement in order to help inform and shape its direction in the administration of the TSP.

The Data Governance Policy provides a framework to structure decisions about how the FRTIB will collect, use, structure, retain, and share data, and ensure that business or IT related initiatives have been reviewed by subject matter experts relative to the impact those initiatives may have on our data environment.

1.1. Key Definitions

Data Impact: The impact of potential changes on the way the FRTIB collects, uses, structures, retains, and shares data. Hardware platforms where data resides and the security of the pipelines data travels are specifically excluded from this definition.

Data Models: Maps showing what data is stored where. The Data Models will show the various data stores in the enterprise, and then further break the data stores down into databases, tables, and columns. The models retain the essential information about the type of data stored, and identifies the general category (e.g. SSN, Name, Address) of the data contained. They also store relationships between tables, and shows the flow of data between applications. The models do not, however, contain any actual data.

Data Steward: The primary office for defining, managing, controlling, and preserving the integrity of their assigned data elements, as well as determining the business categorization, rules, and definitions

for those elements within the enterprise, and applying this governance process to that data. This role is independent of the application on which the data resides.

Enterprise Data Architecture: A set of models and business rules that govern and define the type of data collected and how it is used, stored, managed, and integrated within an enterprise and its database systems.

Metadata: Metadata provides information about one or more aspects of the data; it is used to summarize basic information about data which can make tracking and working with specific data easier. For instance, metadata on SSNs would indicate that an SSN should be 9 numeric digits, but would not actually contain actual participant SSNs.

Structured Data: Data which is stored in a readily identifiable structure, contains defined fields, and is easily read by a database or other technology. Examples include database files, text files in a comma-delimited format, and log files.

Unstructured Data: All data not structured as described above. Examples include emails, images, voice recording, PDF documents, and unformatted text files.

2. Policy

The Data Team shall define processes designed to ensure that all uses of data and sharing of data are appropriate and comply with all applicable regulations. FRTIB shall maintain a Data Team charged with executing the processes prescribed by this policy.

The Data Team shall develop an Enterprise Data Architecture for data that is stored, transmitted, or received by accredited FRTIB systems.

2.1. Data Team

The Data Team makes decisions on the following:

- Undertaking projects that impact the usage, sharing, and storage of data
- Implementing change requests that impact the usage, sharing, and storage of data
- Authorizing new uses of data

- Authorize entrance into data sharing agreements

The decision shall be provided before a determination is made concerning whether to proceed with the proposed data action, well before any A&A/PIA processes are initiated. The decision provides feedback to be used for project planning and initial design work.

The Data Team shall consist of a core team augmented by subject matter experts as needed. The core team shall be comprised of a subject matter expert from OPR, OGC, ORM, and OTS (OTS will have 2 representatives to cover security and architecture expertise). The Data Team shall be chaired by the Division Chief of Business Intelligence, who will determine the additional offices required for a particular matter.

The Data Team shall focus on data as an asset; it does not provide advice on the technical details of transfers and security (i.e., protocols, ports, encryption, servers, etc.). The Data Team will evaluate the need for the data, the type of data required, whether the data will be used appropriately and managed appropriately given the context, and the amount of time for which the data will be retained.

The Data Team decision process does not replace any existing governance requirements such as (but not limited to) A&A documentation or completion of a PIA, where necessary. The Data Team does not require a consensus to render a decision. In the event of conflicting opinions, viewpoints of all Data Team members will be included in the decision.

2.2. Entry Points for FRTIB Data Team Decision Process

FRTIB shall provide a process for submission of requests to the Data Team. The following entry points are established:

- Information Technology Steering Committee (ITSC)
- OTS Portfolio Working Group (OPWG)
- Enterprise Prioritization Working Group (EPWG)

- Business Intelligence Division (BI)

- Individual Office
  - Any new initiative, data requirement, change proposal, or use case involving data shall be submitted to the Data Team for awareness and decision.
  - Any data quality issues that are discovered by any office shall be reported to the Data Team for risk determination.

2.3. Data Stewardship

Each FRTIB data element shall have a Data Steward. The Enterprise Data Model serves as the repository of all data elements and each element's Data Steward. The Data Team shall periodically review Data Stewardship assignments recorded in the Enterprise Data Model.

FRTIB shall continuously strive to improve the quality of data it controls, processes and shares, whether the data is generated internally or received from external sources. Each FRTIB office that serves as a Data Steward shall monitor data condition and report quality concerns to the Data Team.

2.4. Enterprise Data Architecture

FRTIB shall maintain an Enterprise Data Architecture. The Data Models which comprise the Enterprise Data Architecture are generally limited to structured data (e.g. data in databases) found on servers, and do not attempt to encompass unstructured data or locally developed and stored structured data (e.g. Excel spreadsheets on a shared drive). Data Models shall contain information defining and categorizing structured data within the FRTIB environment (aka "metadata").

2.4.1. Privacy-related fields

The Privacy Division within the Office of General Counsel shall determine, where applicable, the appropriate subtypes for categorization of PII and their definitions (e.g., PII or Sensitive PII), if any.

2.4.2. Data classification categorization

The Office of Resource Management (ORM) Records Management shall define data classification categories (e.g., Controlled Unclassified Information). The Business Intelligence Division and Data Stewards shall base categorization decisions on those definitions.

2.4.3. Data retention categorization

Data retention categories shall be based on published records schedules which are managed by ORM. In any case where the application of the appropriate Record Control Schedules to electronic data fields results in multiple options, the Data Steward, Records Officer, and Business Intelligence Division shall discuss the elements and schedules in question and make a joint determination based on the data characteristics, use, and lineage, and the precedent of application of the related records control schedules.

2.4.3.1. Data retention in merged data sets

Retention schedules of mixed data sets shall be based on the business purpose, but shall not exceed the longest retention timeframe of an individual data field.

2.4.3.2. Data architecture scope

The Data Team will set overall data modelling priorities. The Business Intelligence Division will then implement those priorities and ensure an appropriate scope and level of detail is included. Data sets may be excluded from the Enterprise Data Architecture when insufficient business value results from their inclusion. The Data Team will also have oversight over the level of detail provided in any publicly published data inventory.

2.5. Data sharing to support research

The Data Team shall review all proposals to share participant data outside the Board. To supplement regulatory guidance on data sharing, the Data Team also shall consider the following when reviewing such arrangements:

1. Any sharing agreement shall comply with the requirements contained in FERSA to ensure any sharing of participant data is done prudently, solely in the interest of, and exclusively for providing a benefit to TSP participants and their beneficiaries.

2. The potential research outcomes shall clearly provide greater benefits to the participants and beneficiaries than the risks assumed by sharing the data.

3. Data sharing agreements to support research shall require that the Data Team approve each research topic that will utilize the data.

4. Data sharing agreements to support research shall require a review of the draft publication to ensure participant privacy is protected and the intent of the research proposal was met.

Any data sharing agreements related to research must comply with all standard policies and procedures regarding externally shared data including, but not limited to, compliance with the Fair Information Practice Principles; data protection standards; allowable uses; data retention/destruction requirements; and such sharing restrictions must be appropriately documented in contracts, MOUs, MOAs, and ISAs.

3. Applicable Procedures

- Data Management and Usage Decision Procedures
- Data Team Administrative Procedures
- Enterprise Data Model Development and Sustainment Procedures

4. Revision History

Date	Version	FRTIB Author	Comments *(briefly summarize change)*
1/16/2019	1.0	Geof Nieboer	Initial
3/27/2020	2.0	Geof Nieboer	Added section 2.4.3.2 - updated to include new policy language
12/13/2022	3.0	Alexander Podpaly	Updated office name and office director's name.

5. Approval

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