

Pre-Publication Review Policy

References

- Effective Date: March 1, 2024
- Approved By: P20 WIN Data Governing Board

Policy Purpose

The purpose of this policy is to outline the P20 WIN pre-publication review process. The establishment of a pre-publication review policy and process will help ensure that data requestors can prepare adequately to release analyses of data, that agencies can make informed decisions for the release of data, and that data are in compliance with all applicable state laws, policies, and regulations throughout the P20 WIN information lifecycle.

Policy Statement

To fulfill the mission of P20 WIN to inform policy and practice, agencies must be able to ensure that data will be released in accordance with federal and state laws and not compromise the confidentiality of those whose data it represents. Publication of data must not lead to the reidentification of individuals. In order to ensure this, the pre-publication review must involve people and process – and involve legal and procedural measures to ensure data is being released responsibly.

Data Recipients also must maintain intellectual freedom and the right to express their findings and conclusions as they fulfill the purpose of the research that was outlined in the approved data request, in line with the cell suppression guidelines, data labels, and confidential data disclosure in any materials being assessed for release. Participating Agencies maintain the right to review these materials and provide feedback. If a Participating Agency believes that data has not been interpreted correctly, they retain the right to convey that to the Data Recipient.

To set clear expectations, P20 WIN agencies will describe the critical components of suppression guidelines and data labeling for anyone requesting data. Requirements for data requestors will be communicated clearly and transparently to facilitate the request process. This will include a review of any data analyses that a data requestor would like to share with any party outside of the Data Sharing Agreement.

Related Documents

Pre-Publication Process

[Enterprise Memorandum of Understanding](#) (E-MOU): Under the P20 WIN E-MOU, the Data Governing Board has responsibility to ‘Review and approve Data Sharing Requests, data output and resulting publications prior to release in accordance with applicable law and in accordance with Section XI of this E-MOU and pursuant to the Participating Agencies agreeing to share their data pursuant to a signed Data Sharing Agreement.’ Section XI states ‘Determine the Participating Agencies’ confidentiality and privacy requirements, permissions and limitations for Data Recipient’s dissemination or publication of the results before release beyond the Data Recipient(s) named in the DSA.’

Data Sharing Agreements are signed by Participating Agencies, the Data Integration Hub, and Data Recipients for specific data requests. This agreement outlines the responsibilities of all parties, data users, cell suppression policies, fees, and Exhibits.

Revision History

Version Number	Version Date	Description of Change	Point of Contact
1			

Pre-Publication Review Process

References

- Related Data Policy: Pre-Publication Review Policy
- Effective Date: March 1, 2024
- Approved By: Data Governing Board

Purpose

The purpose of this process is to document the steps for approval of dissemination materials that are created from analyses of P20 WIN requests. Participating Agencies are to ensure that data are properly aggregated for release, data are labeled correctly, and that confidential data are not disclosed.

Applicability

This process applies to OPM, all P20 WIN Participating Agencies, and the Data Recipient and the components will be incorporated into data sharing agreements.

Definitions

Analytical Data – the Data provided by the Participating Agencies to the Data Recipient pursuant to a Data Sharing Agreement signed by two (2) or more Participating Agencies. Analytical data includes all the elements requested by the Data Recipient for analysis from each of the Participating Agencies. The data files also include the fake IDs that are used along with the ID crosswalks prepared by the Data Integration Hub to link the analytical data files from the multiple Participating Agencies.

Cell Suppression Size – the minimum number that is allowed to be shown in any Dissemination Materials. This number will be defined in the DSA.

Data Recipient - any person, entity or organization that is a party to an approved Data Sharing Agreement that receives Data sets from Participating Agencies for legitimate state purposes.

Data Sharing - the act of securely transferring Data with multiple users or applications, integrating different data sets between the Participating Agencies, the Data Integration Hub and Data Recipients. Data Sharing shall encompass the utilization of personally-identifiable information for the creation of anonymized personal information and aggregate information.

Dissemination Materials – any documents, underlying data aggregations for dashboards, presentations, data visualizations, data tables, or other products that a data requestor creates from P20 WIN Data to be shared beyond the Data Recipient.

Operating Group – The Connecticut Office of Policy and Management (OPM) that facilitates the smooth and efficient operation of P20 WIN for the benefit of the Participating Agencies and the greater benefit of the State of Connecticut.

Participating Agency - any entity that has executed an enterprise memorandum of understanding for participation in P20 WIN and has been approved for participation pursuant to the terms of that agreement as defined in C.G.S. § 10a-57g(6).

Personally-Identifiable Information (“PII”) - information capable of being associated with a particular individual through one or more identifiers, as defined in state and /or federal law, including but not limited to C.G.S. §§ 4e-70(4), 10-234aa(4), 10a-42h, 31-254, 31-701b(a), and 42-471; 20 CFR §603; 34 CFR Part 99.

Implementation: The following steps describe the process to be used for approval of dissemination materials, upon analyses of an executed DSA through P20 WIN. The standard process is designed to cover most scenarios, but agencies can agree to variations or modifications to this process on a case-by-case basis, if documented in the DSA and the associated attachments.

Optional Preliminary review:

If the Participating Agencies that contributed data wish for a prior review of any findings or Dissemination Materials, a written request must be made to the Data Recipient and Operating Group over email. The terms of sharing these materials will be determined by the Data Recipient and the Participating Agency, with the Operating Group documenting and ensuring that these terms are met by both parties. These prior reviews will be handled individually based on the nature of the request and the interests of all involved parties. These prior reviews will happen in addition to the Pre-Publication Review Process, as outlined below.

If the Data Recipient would like the Dissemination Materials reviewed prior to the Pre-Publication Review Process, they are allowed to request that of the Operating Group and Participating Agencies that contributed data. The exchange of these Dissemination Materials must happen over encrypted email, which is to be set up by the Operating Group. The Operating Group will set up a secure email chain with encryption and that prevents forwarding of the email contents. There is no timeline for these informal reviews. These reviews occur in addition to the Pre-Publication Review Process, as outlined below.

Required Pre-Publication Review:

- 1) The Data Recipient must inform the Operating Group at least 5 days prior to their ability to share that they have Dissemination Materials that are prepared to undergo the Pre-Publication Review Process with the Operating Group and the Participating Agencies that contributed data. If the Data Recipient informs the Operating Group that any of the Dissemination Materials are in the format of a dashboard or other online data visualization, the data underlying the dashboard will be required to undergo the Pre-Publication Process rather than the tool (e.g. Tableau, etc.) in which it will be implemented.
- 2) The Operating Group creates an encrypted email chain that also cannot be forwarded in which the Data Recipient can reply with the Dissemination materials.
- 3) The Operating Group does an initial review of the materials within 3 business days to ensure that the Cell Suppression Size outlined in the DSA is being followed throughout the Dissemination Materials. If there are any violations of the Cell Suppression Size, the Operating Group informs the Data Recipient that it must be revised. If there are any uncertainties if the Cell Suppression

Size is being followed (e.g., numbers represented in small percentages), the Operating Group informs the Data Recipient that it must be revised to provide more detail and clarity, such as adding a footnote. The 10 business day timer starts once revised Dissemination Materials are securely sent back to the Operating Group for review within the original encrypted email chain or once the Operating Group notifies the Data Recipient that their initial review did not uncover any need for revisions. The Operating Group approves the Dissemination Materials to be shared with the Participating Agencies who shared data.

- 4) The Operating Group creates an encrypted email chain that also cannot be forwarded and securely sends the Dissemination Materials to the appropriate recipients of the Participating Agencies that contributed data: Data Governing Board members and any Data Stewards identified by the Data Governing Board members. These materials should not be shared with anyone outside of the original recipients of the secure email. The Operating Group communicates the 10 day deadline for review of the materials.
- 5) The appropriate recipients at the Participating Agencies that contributed data review the Dissemination Materials. Approval of the Dissemination Materials or any feedback, questions, or concerns should be provided in writing to the Operating Group by the specified deadline for review. The review should be of the following nature:
 - A. Cell Suppression Size – ensure that the size that is outlined in the DSA is being met
 - B. Data Labels – ensure that data is correctly labeled. This also includes ensuring that the labels describing the source of the data are accurate (e.g. that results involving a specific program accurately describe what that program is, who it serves, how services are provided, etc.)
 - C. Confidential Data Disclosure – ensure that there is nothing in the Dissemination Materials that causes concern for privacy.
- 6) The appropriate recipients of the Participating Agencies that contributed data may also review additional content in the Dissemination Materials (e.g. feedback on methodology, conclusions, limitations, etc). Any feedback, questions, or concerns should be communicated with the Operating Group by the specified deadline. The Operating Group will supply this feedback to the Data Recipient, however, they are not required to address the feedback in the Dissemination Materials as it outside the scope of standard review.
- 7) The Operating Group communicates the approvals of the Dissemination Materials and/or any feedback, questions, or comments with the Data Recipient. If substantial revisions are necessary to ensure that Cell Suppression Size, Data Labels, and Confidential Data Disclosure are being met, the Pre-Publication Review process may be restarted upon request by any party to the data sharing agreement.

Related Documents/Attachments

Pre Publication Review Policy

Revision History

Version Number	Version Date	Description of Change	Point of Contact