

Consumer Financial Protection Bureau

Data Release Group Charter

I. Purpose and Guiding Principles of the Data Release Group

As a data-driven Agency, the Bureau understands the value and potential for publicly releasing certain data sets that we collect and manage. To this end, the Data Release Group (“DRG”) was formed to 1) coordinate the review of potential Bureau data releases to the public and 2) facilitate the appropriate level, if any, of disclosure of public use datasets by the Bureau. The Bureau’s DRG will assess proposed data releases based on the following principles:

- Datasets should be made publicly available, where legally permissible and appropriate.¹
- Information should be managed as an asset throughout its life cycle to promote openness and interoperability, and sufficient security of information and information systems.
- Effective de-identification techniques should be applied when necessary to reduce risks associated with the public disclosure of datasets.
- Effective communication about the data before and after the data release, where possible, improves its usefulness to the public and helps to safeguard the Bureau
- Data releases should be released on the Data & Research page of the Bureau and should follow the guidelines and principles of www.consumerfinance.gov
- Data releases should align with Bureau-wide priorities informed by resource capacity and ability.

The DRG works with Bureau stakeholders to review and refine requests for data release. The DRG then makes recommendations regarding the requests to the Chief Data Officer (CDO)², who has the authority to decide whether or not to release the data.

II. Membership

A. Members and delegates

The standing members of the DRG include the following members:

- A representatives from the Data Policy Team
- A representative from the Legal Division
- A representative from the Privacy Office, and

¹ The Bureau performance plan and report, February 2015, Performance goal 4.2.1.

² Under the *Policy on Information Governance*, the 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 determine what data we publicly release to the CDO. The CIO may still exercise his/her information governance oversight authority at his/her discretion.

- A representative from External Affairs
- A representative from the Office of Research

B. Delegates

DRG members may, at their own discretion, have a delegate attend a meeting in their place. Delegates will have the same authority as the member they are representing. The DRG may invite other Bureau stakeholders to attend meetings or engage in relevant topics. The DRG Coordinator may invite the Data Steward and other Bureau partners to review the data release request, as necessary.

C. Membership selection

Members shall be identified by senior leadership in the areas identified above. Leadership may change their choice of appointed representative at any time by notifying the Data Governance Board or Data Policy Team.

III. DRG Coordinator

The Data Policy Team will appoint a DRG Coordinator to facilitate review of potential public data releases by the Bureau, and to manage the DRG review process. The DRG Coordinator is responsible for determining the appropriate path by which the Bureau may consider releasing information.

The DRG Coordinator, with support from the CDO Data Policy Team, is responsible for:

- Scheduling regular meetings
- Planning meeting agendas
- Working with staff who would like to request to release data publicly
- Compiling and sharing materials for DRG member review, prior to the meeting
- Facilitating the collection and submission of recommendations from each DRG member
- Facilitating the approval, and/or escalation to the DGB, as necessary
- Recording all decisions
- Notifying Design & Development that the request has been approved for release, and
- Maintaining relevant DRG documentation (e.g. meeting presentations, minutes, recommendations) in a central location

IV. Roles and Responsibilities

Facilitated by the CDO Data Policy Team, the DRG is responsible for assessing whether and how data should be publicly released by the Bureau in accordance with relevant Bureau policies and applicable laws. As part of this assessment, the DRG will provide recommendations to the CDO, or his or her delegate. Each DRG member is responsible for providing timely review, feedback and recommendations related to the potential public release of data brought before the DRG.

The DRG does not review data releases that are made pursuant to a delegation of authority. For example, the DRG does not review trial exhibits in Enforcement actions. The office or division that releases data pursuant to a delegation of authority will report the data release to the Data Governance Board as part of the annual delegation of authority review process.

Other specific responsibilities:

Chief Data Officer (CDO) – Reviews the recommendations of DRG Members, and the DGB if necessary, and makes a final decision regarding the data release request.

DRG Coordinator – Provides relevant guidance and documentation to the Requester; acts as a liaison between the Requester and DRG members; guides the requester through the process, proactively identifies any issues for discussion, and partners with the Requester and DRG members to review. Convenes the DRG and relevant Bureau partners; meets with the Requester for an initial data release consultation to discuss the process, desirability and feasibility of the request; helps the Requester identify information to gather and tasks to consider; and identifies additional resources that may be necessary and connects the requester with any additional resource processes. If significant policy, legal, privacy, reputational, operational or other concerns are identified during the review by DRG members and Data Governance Lead, the DRG Coordinator elevates the request to the DGB for consultation.

DRG Member – Reviews and provides recommendation regarding the data release request to the CDO. Includes invited Bureau members that advise on data release requests.

Data Governance Board (DGB) – In its role as the advisory body that assesses risks and benefits associated with managing the Bureau's data assets, the DGB reviews and provides a recommendation to the CDO on the data release request, when necessary, such as when significant policy, legal, privacy, reputational, operational or other concerns are identified during the review process.

Data Governance Lead – Facilitates escalations and discussions with the DGB members.

Data Steward – If different from the Requester, the Data Steward is the primary point of contact for the data. For example, the Data Steward is generally listed as the point of contact in the Bureau's Data Catalog. The Data Steward participates in the review of the data release.

Requester – Develops and drafts a data release request; collects supporting documentation for review; and obtain support and confirmation that the work is a priority from the Requester's Office/Division management. As needed, the Requester socializes and seeks feedback on proposal across the Bureau. The Requester and other Bureau partners consult with DRG members to discuss data release request and present a final data release request to the DRG.

IV. DRG Process

A. Meeting schedule

The DRG will meet, as needed, to respond to Bureau staff requests. Meetings shall be held at a time convenient to as many members as possible.

B. Required Reviews

If the DRG Coordinator, Data Policy Team, or CDO determines that a DRG review is required, relevant information about the proposed data release is provided to the DRG for review.

C. Required Recommendations and Approval

For each data release for which DRG review is required, DRG representatives provide their recommendation as to whether or not the Bureau should publicly release the data. These recommendations may include reservations or conditions and should be conducted in a timely manner.

Each DRG member is responsible for conducting an independent review of releases under the laws, regulations, and Federal policies that govern their respective areas of compliance. Individual DRG members, unless otherwise delegated, do not have the individual authority to approve a release of information from the Bureau.

During the review process, the CDO may request more information from the DRG members or the Requester, or discuss the proposed data release with the Data Governance Board or other advisors. The CDO ultimately approves or rejects the proposed data release request, and may indicate reservations, require conditions of approval or restrictions on release.

D. Timing of Data Release

Data subject to review by the DRG may not be publicly released by the Bureau until it is approved. In extenuating circumstances, the CDO may approve or reject a given data release without DRG review. The CDO informs the Data Policy Team, who in turn informs the DRG, of any such decision, and any such data release may be subject to post-hoc DRG review.

E. Documentation and Reporting Requirements

The DRG Coordinator, with support from the Data Policy, maintains and circulates, as needed, documentation about each data release request. The data release request should include, but is not limited to, the description, purpose, and anticipated use of the data. The DRG Coordinator will maintain documentation of recommendations from DRG members and the DGB and the ultimate decision on each data release request.

The Data Policy Team will provide read-outs to the DGB on DRG activity generally on a quarterly basis, but no less than annually. These read-outs will include summaries of determinations when requests have been received and approved by the DRG Coordinator, CDO, for releases of information other than through the DRG process.

V. Revision History

Action	Date	Approval Authority
Initial pilot version	11/01/16	Reviewed by DGB
Revised version	11/14/17	Linda Powell, CDO

VI. Signature and Effective Date

Approved: Linda Powell

Date: 2/14/2018

Linda Powell, Chief Data Officer

This Charter is effective when signed.