Office of the Education Ombuds
Open Data Plan
December 2017 (Draft)

The Office of the Chief Information Officer (OCIO) adopted an Open Data Policy that directs state agencies to develop, implement and maintain an open data plan by October 1, 2016. Agencies also must report to the OCIO at least every twelve months on the status, progress and evolution of their plans.

As part of its core mission, the Office of the Education Ombuds (OEO) collects only the data necessary to perform confidential Ombuds work with families, community professionals and the Washington State public k-12 schools. We are committed to ensuring confidentiality to the families, community professionals and schools served by our agency. OEO recognizes that there is benefit to open data shared with the general public, provided it does not disclose any identifiable information related to individuals who share information with us, including the families, community professionals and schools served by OEO. OEO publishes its data in an annual report to the Legislature, which is posted publicly on the OEO website: www.oeo.wa.gov. By making data available in an open and readily usable format, we facilitate transparency in government and enable the public and policymakers to engage in our work and make better decisions.

OEO will support and promote open data in our work as outlined in this plan.

Principles

OEO commits to these core principles:

- We promote data access for the public, researchers and decision makers while conforming to privacy and data security requirements in state and federal law.

- We will accommodate requests for data and information, subject to privacy, data security, and workload constraints. Requests that fall under the Public Records Act will be handled in accordance with the requirements of the act.

- Where workload constraints limit our ability to meet data needs, we will pursue Lean principles to improve our efficiency.

Plan Representatives

OEO's Communications and Database Coordinator is the Open Data Plan representative. She will guide implementation of this plan and monitor the agency's progress. Other OEO employees will have a role in implementing elements of the plan as outlined below.

In addition, OEO's Communications and Database Coordinator will facilitate the review and evaluation of this plan on an annual basis. Revisions will be proposed to the OEO Director whenever necessary.

Definitions

This plan is based upon the following definitions provided in OCIO's open data policy.

Data means final versions of statistical or factual information that:

- are in alphanumeric form reflected in a list, table, graph, chart, or other nonnarrative form, that can be digitally transmitted or processed;

- are regularly created or maintained by or on behalf of an agency and controlled by such agency; and
- record a measurement, transaction, or determination related to the mission of the agency.

Data set is a named collection of related records maintained on a storage device, with the collection containing data organized or formatted in a specific or prescribed way, often in tabular form.

Open Data means public data that are freely available, machine readable, and structured in a way that enables the data to be fully discoverable and usable by end users. Open data does not include:

- Data identified by the state agency holding it as category 3 or category 4 data under the data categorization provisions of the state policy "Securing Information Technology Assets" ([OCIO policy 141.10](#) section 4)

- Any data set or portion of a data set to which the state agency may deny access pursuant to the public records act, chapter 42.56 RCW, or any other provision of a federal or state law, rule, interpretive policy statement, regulation or local law;

- Data that reflects the internal deliberative process of a state agency or agencies, including but not limited to:
    - negotiating positions,
    - future procurements,
    - pending or reasonably anticipated legal or administrative proceedings;

- Data subject to copyright, patent, trademark, confidentiality agreements, or trade secret protection;

- Proprietary applications, computer code, software, operating systems, or similar materials;

- Data related to internal state agency administration, including employment records, internal employee-related directories or lists, and facilities data;

- Any unstructured data that cannot feasibly be converted to an open format as required by uniform standards adopted by the OCIO without undue financial, operative, or administrative burden on the state agency; or

- Data or data sets classified as category 2 data pursuant to the state policy "Securing Information Technology Assets" ([OCIO policy 141.10](#) section 4) that the head of a state agency, after due consideration and consultation with the OCIO, determines should not be published on the open data portal because publication would be detrimental to the public interest.

Strategies and Procedures

1. **OEO will incorporate public access when acquiring, redesigning or rebuilding information systems.**

    - Decision packages for information systems submitted for review by OCIO will include open data as a component of the system design.
    - Project changes or updates discussed and approved at OEO staff meetings will include consideration of public access.

2. **OEO will coordinate technology planning across agency boundaries to facilitate electronic access to state data by:**

    - naming the Communications and Database Coordinator responsible for overseeing our open data efforts and reporting outcomes and results to OCIO at least every twelve months.

- compiling and publishing a forward-looking list of significant upcoming data releases and updates. *(annual report)*
- identifying staff who will be responsible for management of data, including open data or specific data sets. *(Communications and Database Coordinator)*

3. **OEO will develop processes to determine which information the public most wants and needs by:**
   - engaging strategic partners whenever possible for suggestions on which datasets to prioritize. *(Director)*
   - tracking the number of hits on select agency webpages. *(Communications and Database Coordinator)*
   - reviewing the dates and topics of public records requests to determine whether the most frequently requested data can be posted online. *(Public Records Officer)*
   - maintaining a list of research and data requests received. *(Public Records Officer)*

4. **OEO will develop and use the following methods to readily withhold or redact non-disclosable data.**
   - Annually, all OEO staff will be trained on public records requirements and procedures, including approved methods to withhold non-disclosable data. *(Public Records Officer)*
   - The agency will develop standards to apply to datasets before opening those that may contain real or potential personal identifiers. *(Communications and Database Coordinator)*
   - Pursuant to RCW 43.105.365 and Executive Order 16-01, we will continue to examine our data retention practices and retain personal information only as long as needed to carry out the purpose for which it was originally collected or the minimum period required by law. Our practices also will adhere to the state general retention schedules adopted in 2016 (Version 6.0), which made numerous changes in how data should be handled. *(All employees)*

5. **OEO will develop and employ technical mechanisms for posting open data by:**
   - identifying IT tools necessary for extracting, transforming and loading datasets to our websites. *(Communications and Database Coordinator)*
   - publishing and posting a list of open datasets that includes their website locations. *(Communications and Database Coordinator)*
   - identifying who will be responsible for posting these datasets and communicating updates to the Data and Technology unit for purposes of maintaining the open data inventory. *(Communications and Database Coordinator)*

Relevant law and resources

OCIO Policy 187 - Open Data Planning
Electronic access to public records – RCW 43.105.351