DATA GOVERNANCE BOARD CHARTER

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Introduction

The Office of the Comptroller of the Currency (OCC) views data as a strategic asset and is committed to meeting the principles and practices of the Federal Data Strategy while aligning agency data initiatives with strategic and business objectives established by the OCC Strategic Plan.

Purpose of the Document

The purpose of this charter is to define the authority, membership, and roles and responsibilities of the OCC Data Governance Board (DGB) and its relationship to other internal bodies.

Background

Data governance is the process of setting and enforcing priorities for managing data as a strategic asset in service of an agency's mission. The Chief Data Officer (CDO) has executive responsibility for governance of the OCC's data assets. The DGB aids the CDO by providing an agency-wide perspective on priority-setting and decision-making for data initiatives.

To establish the OCC's enterprise data governance (EDG) program, the Technology and Systems Subcommittee (TSS) identified five guiding principles[1]: Quality; Security; Integrity; Accessibility; and Accountability/Responsibility. Through a rigorous EDG program, the OCC will minimize adverse effects of poor data quality; ensure data are secured with proper technical controls; manage data integrity from onboarding through final disposition; provide access to data in a manner that advances the OCC mission; and hold users accountable for proper stewardship and use of agency data.

The EDG program operationalizes the TSS guiding principles, along with executive guidance from the EDG program sponsors, throughout the complete data lifecycle. The EDG program is directed by the CDO, informed by the DGB, and supported by key data roles throughout the agency:

- Data sponsors are agency officials accountable for ensuring data governance processes are followed and guidelines are enforced for agency data assets.
- Data stewards[2] operate on delegated authority from the data sponsor, coordinating or providing operational support for data assets.
- EDG program support staff develop and maintain agency policies, processes, tools, and metrics necessary to manage data effectively and efficiently.

OCC data governance activities must align with the OCC Data Strategy[3] and advance the OCC's vision that the value of data is realized through integrated data and technical solutions, practical and sound analytical approaches, and consolidated administration of data assets.

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[1] See **Appendix A – Guiding Principles** for a definition of each principle
[2] Data stewardship is divided into two roles: business data steward, responsible for understanding the data, why the OCC has the data, and how the data are used; and operational data steward, responsible for coordinating or providing data management activities. Both steward roles can be performed by a single individual, or they can be performed separately.
[3] The OCC Data Strategy aligns agency priorities with federal guidance on data activities that go beyond governance.

Authority

Authority for data governance activities within federal agencies is established by the Foundations for Evidence-Based Policymaking Act of 2018 ("Evidence Act"), particularly Title II – OPEN (Open, Public, Electronic, Necessary) Government Data Act. As the agency executive accountable for data governance, CDO authority is subject to applicable Executive Orders, national policy, public law, and the authority of the Comptroller of the Currency. Authority and responsibilities of agency data governance bodies are further defined by the President's Management Agenda[4], the Federal Data Strategy[5], and Office of Management and Budget guidance[6].

The OCC DGB operates under authorization from the CDO. DGB members represent specific lines of business (LOB) or functions within the OCC. Each DGB member is authorized to address data governance concerns on behalf of their LOB or function.

This charter will be reviewed periodically to ensure that the intended purpose of DGB is being achieved. Modifications to the DGB charter can be proposed by any member of the DGB. The CDO will review all proposed changes for approval.

Membership

The DGB comprises a diverse set of bank supervision and supervision support staff responsible for various aspects of data management, data sponsorship, data stewardship and data usage. DGB membership includes senior staff with responsibility for diverse aspects of data management, as well as senior officials from OCC program areas, or their designees. DGB members from the following business units serve as voting members

- Chief Data Officer (CDO), Chairperson
- Senior Deputy Comptroller (SDC) for Management and Chief Financial Officer (CFO)
- Chief Operating Officer (COO)
- SDC for Large Bank Supervision (LBS)
- SDC for Midsize and Community Bank Supervision (MCBS)
- SDC for Economics
- SDC for Bank Supervision Policy (BSP)
- SDC for the Office of Enterprise Governance and the Ombudsman (OEG/OMBD)
- SDC and Chief Counsel (CCO)
- Chief of Staff and Public Affairs (COS/PA)

The following representatives are non-voting members and participate on the DGB in an advisory capacity. The non-voting representatives are from the following business units

- Chief Risk Officer/Office of Enterprise Risk Management (OERM)
- Chief Information Officer (CIO)
- Chief Information Security Officer (CISO)
- Senior Agency Official for Privacy (SAOP)
- Senior Agency Official for Records Management

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[4] https://www.performance.gov/PMA/PMA.html
[5] https://strategy.data.gov/
[6] OMB Memorandum M-19-23 Phase 1 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Learning Agendas, Personnel, and Planning Guidance (https://www.whitehouse.gov/wp-content/uploads/2019/07/M-19-23.pdf)

- Freedom of Information Act (FOIA) Officer
- Acquisition Management (AQM)

Internal Procedures, Meetings, and Communication

Committee Activities – DGB support primarily will be provided by EDG program support staff and be supplemented as needed.

Quorum – Quorum is defined as a majority of the voting members.

Agendas and Meeting Structure – EDG program support staff develop agenda items to address strategic direction and to generate implementation recommendations and resolve issues. EDG program support staff will collect agenda items from DGB members and circulate agendas and supporting materials in advance of each meeting to promote informed discussions on scheduled topics. Meeting agendas will include a program status report, including identification of any emerging risks and mitigation strategies. Meetings shall have notes of discussions, including recommendations and action items. EDG program support staff will ensure that meeting agendas, meeting minutes, and action items are provided to DGB members after each meeting.

Meeting Frequency – Meetings will occur at least quarterly. The CDO may also convene ad-hoc meetings when input is needed to resolve issues or to meet program deadlines.

Information Sharing – The DGB will use the EDG SharePoint site to manage formal and informal documentation. Reviews of artifacts will rely on SharePoint file management capabilities including document versioning and comment retention. Official records of the DGB will be handled according to OCC records management policy.

Reporting – At least quarterly, the CDO will provide a report to the TSS on EDG program status.

Roles and Responsibilities

The DGB will provide recommendations to the CDO regarding strategies, priorities, investments, and policies for implementing an effective EDG program. DGB members will raise strategic and implementation issues and participate in discussions to formulate recommendations to the CDO with a holistic perspective informed by the needs of constituent business units. Day to day operating items will be managed by the data governance program office.

Individual DGB members will serve as champions for EDG program goals and strategies within their own organizations. In addition, members will seek to identify and allocate business resources to achieve program results.

Examples of data governance activities that may need strategic direction or issue resolution to be addressed by the DGB include:

- **Data Identification** – Identify data assets and develop a data inventory with appropriate metadata.
- **Data Standardization** – Normalize data definitions; standardize key calculations and measures.
- **Data Management Policy** – Establish rules for governing the creation, acquisition, privacy, integrity, security, quality, sharing, and use of data.
- **Data Issue Management** – Identify and address obstacles that prevent effective use of data.
- **Data Assessment** – Measure the risk, value, and quality of data; determine appropriate sponsorship.

- **Data Risk Mitigation** – Ensure that standards are in place to reduce the risk associated with the use of sensitive agency data.
- **Data Oversight** – Monitor the agency's data assets and any actions taken to improve them, including proposed business investments.
- **Data Communications** – Create opportunities for information flow to staff and managers.
- **Data Maturity** – Assess and increase the data maturity of the agency.

Decision Making

DGB meetings will be conducted in accordance with the agenda developed and circulated to all DGB members in advance of each meeting. The DGB will review and act on:

1. **Proposed IT Investments related to Data**
   - Voting members of the DGB will vote on recommendations to "approve" or "not approve" data project proposals. For a data project to be included in the OCC annual budget, the project also must be approved through the IT Investment Management process and the OCC capital planning process, which may require direct approval from the Comptroller.
2. **General Data Governance Topics**
   - Collaboration and discussion on data strategies and policies, data projects, data architectures and standards, data asset cataloging, data maturity assessments, and any data requirements from the federal Office of Management and Budget (OMB) that require enterprise coordination and response.

To the extent practicable, decisions will be made by consensus of the voting members or their designated alternate present at each meeting. If a consensus cannot be reached, the CDO will decide the issue or escalate to the TSS if necessary. All decisions of the DGB will be documented in writing and record dissenting views.

Acronyms

The acronyms used in the document, along with their descriptions, are provided in Appendix B.

Appendix List

Appendix A – EDG Guiding Principles

In February 2019, the TSS provided a list of five principles to help guide the efforts of the EDG Working Group. These principles were also leveraged by the Enterprise Data Strategy Working Group to ensure the data strategy aligns with the executive vision for managing data.

Guiding Principles

Quality

- Data must be accurate, complete, timely, consistent with all requirements and business rules, and relevant for a given use.

Security

- Data must be secured and protected to mitigate risk to supervised institutions and the OCC.

Accessibility

- Data are agency/collaborative assets and users with an established business need can access what is needed, when it is needed.

Accountability/Responsibility

- All OCC personnel are accountable and responsible for using data appropriately and for being good stewards of data.

Integrity

- Definitive sources are documented for all data assets.

Appendix B – Acronyms

Acronym	Description
AQM	Acquisition Management
CCO	Chief Counsel Office
CDO	Chief Data Officer
CFO	Chief Financial Officer
CIO	Chief Information Officer
CISO	Chief Information Security Officer
COS/PA	Chief of Staff and Public Affairs
DGB	Data Governance Board
EC	Executive Committee
EDG	Enterprise Data Governance
FOIA	Freedom of Information Act
LOB	Line of Business
OCC	Office of the Comptroller of the Currency
OEG/OMBD	Office of Enterprise Governance and the Ombudsman
OERM	Office of Enterprise Risk Management
OMB	Office of Management and Budget
SAOP	Senior Agency Official for Privacy
TSS	Technology and Systems Subcommittee