Finding a Way Forward: Models of Successful Cross-Sector Data Integration

Deja Kemp, JD
Director of Legal Policy

Actionable Intelligence for Social Policy (AISP)
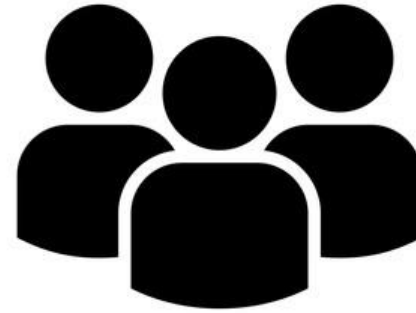
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Getting Started: Menti Code: 7439 9200

Mentimeter

What reasons have you heard for why data cannot be shared?

Waiting for responses ···

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Turn & Talk, 2 minutes

Find a partner and discuss the prompt. What reasons have you given a client for why they can't share data and what was their reaction?

Finding A Way Forward

While there are times where there will be clear "Nos", often times there are:

"Yes AND"

"Yes BUT"

"Maybe"

"No, But"

This resource will help you to imagine other possibilities beyond "No"

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Helping state and local governments collaborate and responsibly use data to improve lives.
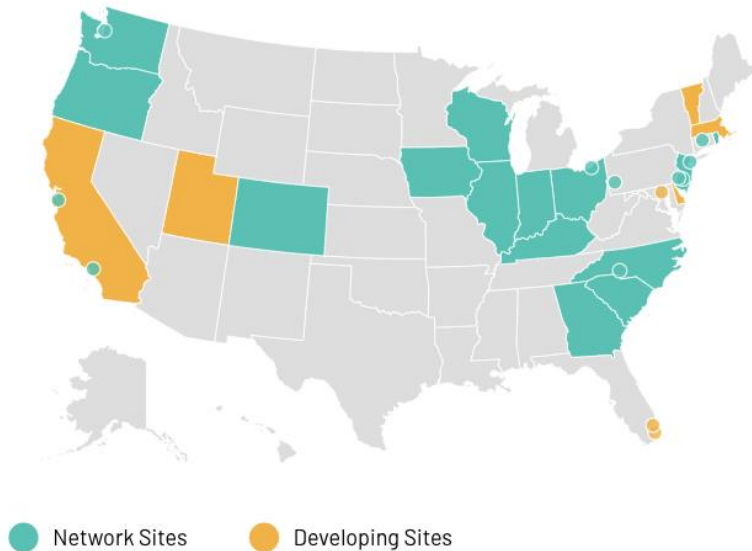
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AISP'S Role

We are:	We are not:
Data evangelists	Data holders or intermediaries
Connectors, community builders, thought partners, cheerleaders, and data sharing therapists	A vendor or vendor recommender
Focused on ethical data use for policy change	Focused on academic research

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Our Network

Network of 36 state and local integrated data systems (also known as data hubs, data collaboratives, etc.) who come together regularly to share best practices

Network Sites   Developing Sites

2023 AISP Network Survey

38 respondents

20 states and **18** local data sharing efforts

370+ years of combined experience

Last 2 Years
387 reports
157 research articles
166 grant proposals

439 current data sharing agreements

What we do

Peer Network

Guidance & Standards

Training & Consulting

Advocacy & Communications

Actionable Research

Our approach

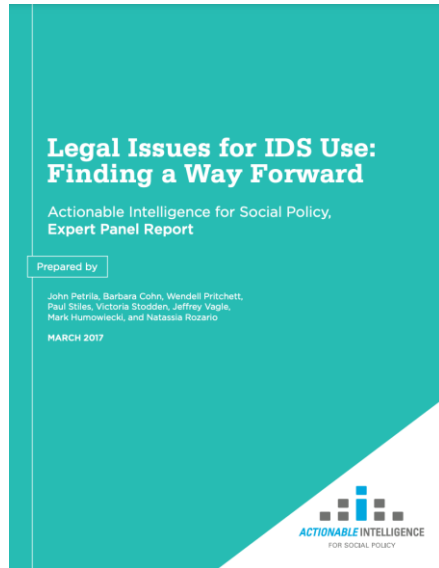Data sharing is as relational

as it is technical.

We don't just need to integrate data;

we need to integrate people.

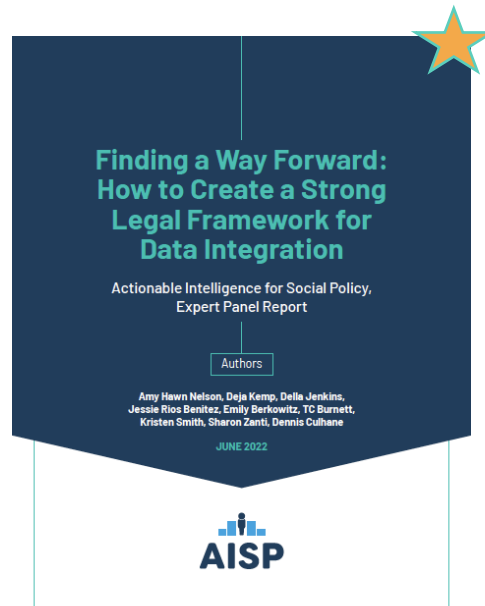**AISP**

When we talk about IDS, what do we mean?

- We're talking about people, not tech solutions

- Efforts that link administrative data across domains/agencies

- Efforts that curate data that are relevant and high quality

- Efforts that serve as a public utility (not research for research's sake)

- Efforts that have defined governance structures (data only used for approved uses)

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LEGAL PUBLICATIONS

2017

2022

2023

Quality Framework for IDS

Governance	Data governance is the people, policies, and procedures that support how data are used and protected.
Legal	Whether data can be shared legally depends on why you want to share, what type of information will be shared, who you want to share with, and how you will share the data. Legal agreements should reflect the purpose for sharing, document the legal authority to serve that purpose, and ensure that data sharing complies with all federal and state statutes.
Technical	Technical components are created to support analytics and insights that can help further improvements in policies, practice, and outcomes.
Capacity	Data sharing capacity refers to the staff, relationships, and resources that enable an effort to operate governance, establish legal authority, build technical infrastructure, and above all else, demonstrate impact.
Impact	All components of quality—governance, legal agreements, technical tools, and staff capacity—exist to drive impact.

See more at aisp.upenn.edu

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Why:
The Four
Questions

Is it legal?

Is it ethical?

Is it a good idea?

How do we know?
Who decides?

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1. Is this legal?
Authority and Access

Establishing the Legal Authority

- Authorizing legislation for agency/department
- Executive Order
- Policy/Rule
- Contracts
- Legislation specific to use

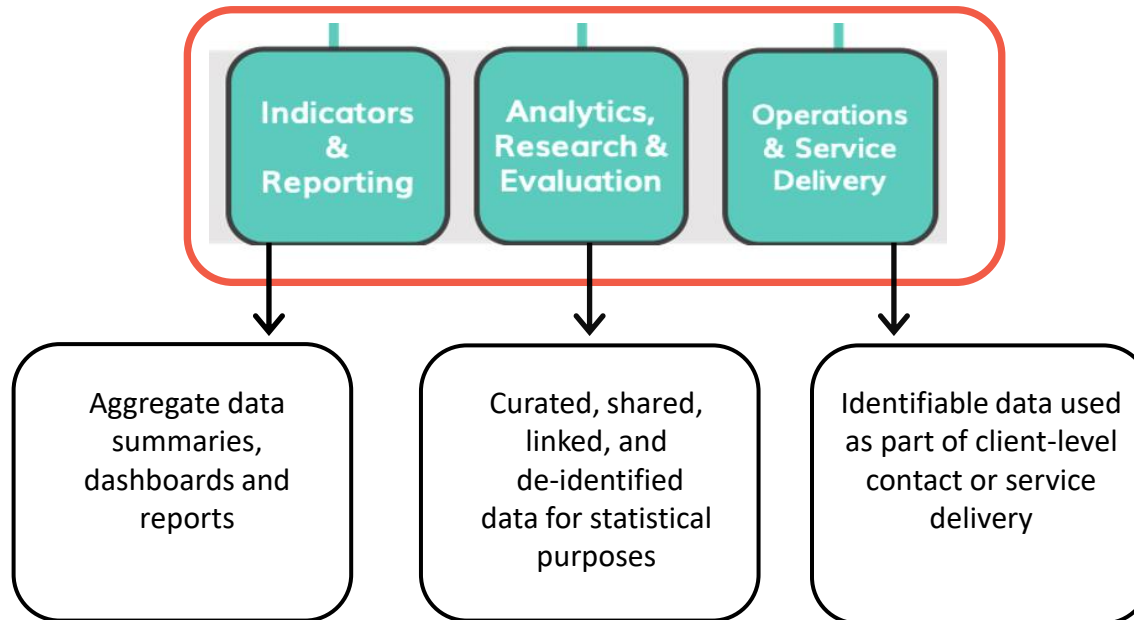| Open Data	Restricted Data	Unavailable Data
Data that can be shared openly, either at the aggregate or individual level, based on state and federal law.	Data that can be shared, but only under specific circumstances with appropriate safeguards in place.	Data that cannot or should not be shared, because of legal restriction or another reason (e.g., data quality concerns).

State & Federal Laws

FEDERAL

HMIS
Protects information collected through the Homeless Management Information System (HMIS), under the guidance of the U.S. Department of Housing and Urban Development (HUD).

FERPA
FERPA protects the confidentiality of education records.

PRIVACY ACT
Regulates personally identifiable records maintained by federal agencies.

HIPAA
HIPAA regulates the protection of individually identifiable health information.

42 CFR PART 2
Stringent federal regulations (referred to commonly as 42 CFR Part 2) protect the confidentiality of alcohol and substance abuse treatment records.

RELEVANT LAWS

STATE

CRIMINAL & JUVENILE JUSTICE RECORDS
State laws typically govern access to criminal records, such as arrest records, and juvenile justice records, such as juvenile court files.

MENTAL HEALTH RECORDS
States typically have statutory provisions governing the confidentiality of mental health records.

MEDICAID RECORDS
Access to Medicaid records is generally controlled by the state agency that administers the Medicaid program.

HIV LAWS
Most states have special laws protecting the confidentiality of information that may disclose a person's HIV status.

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Start at the beginning: what is your core purpose(s) for data sharing?

Indicators & Reporting	Analytics, Research & Evaluation	Operations & Service Delivery
Aggregate data summaries, dashboards and reports	Curated, shared, linked, and de-identified data for statistical purposes	Identifiable data used as part of client-level contact or service delivery

Purpose has important implications

Core Purposes and Approaches for Data Sharing and Integration

Purpose for data sharing and integration	Indicators and Reporting	Analytics, Research, and Evaluation	Operations and Service Delivery
Approach	Data can be summarized and reported at the aggregate	Data must be curated, shared, linked, and then de-identified for statistical purposes	Data must be identifiable and may include case notes to support client-level services
Legal Framework	Data may be publicly available already or may require a simple Data Use Agreement to receive in de-identified format	Data access will generally require multiple agreements, including a Memorandum of Understanding and Data Use License/Agreement to clearly outline permissible access and use	Data access may require client consent and non-disclosure agreements. Data agreements must outline parameters for role-based, credentialed access
Data Frequency	Data may be updated based on reporting cycles, quarterly or annually	Archive of select data may be updated periodically depending on availability and analytic requirements	Daily or real-time updates of entire client records may be required
Privacy and Security	A lack of identifiers or small cell sizes means minimal risk of redisclosure, although demographic information, dates of service, diagnoses etc., mean that data are potentially reidentifiable and must be covered by a Data Use Agreement (except for statistically approved aggregate measures)	Minimal access to identifiable data and small group of approved users means that security requirements are essential but basic	Many users and identifiable data mean that complex permissions and audit trail will be necessary
Cost	Minimal	Moderate	Significant
Difficulty getting started?	Can be difficult, depending on the familiarity of partners	Difficult; labor- and time-intensive	Significant investment of time, labor, and financial resources
Governance	Minimal	Clear parameters around access and use are required, shared processes involving all agencies	

Practice:
Defining Access and Use to Determine Legality

Practice: Defining Access and Use to Determine Legality

Ready to get started? Use the following prompts and examples as a guide to clearly define your data access and use, which then allows you to determine legality.

WHY do you want to share and integrate data?	**WHO do you want to share it with, and who conducts the integration?**
For example, to:	For example:
• Track indicators at the population level	• Executive leadership
• Identify a target population	• Agency serving the same client
• Describe cross-enrollment patterns	• Probation officers
• Identify geographic areas of greatest impact	• A community treatment provider
• Evaluate program outcomes	• A hospital emergency department
• Improve services at the point of intervention	• A university-based researcher
• Conduct mandated reporting	• An agency-based analyst
WHAT type of data do you want to share and integrate? Is it open, restricted, or unavailable?	**HOW will you share the data?**
For example:	For example, provide:
• Information that does not identify individuals	• Aggregate counts at the block group level
• Information that does identify individuals	• Credentialed access to source data
• Information that might identify a person	• Access to public-facing dashboard
• Health information	• View-only access to data underlying a dashboard
• Educational records	• Edit access to data underlying a dashboard
• Housing status	• Row-level data with identifiers
• Demographics	• Row-level data without identifiers

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Why do you want to share and integrate data?

Who do you want to share it with, and who conducts the integration?
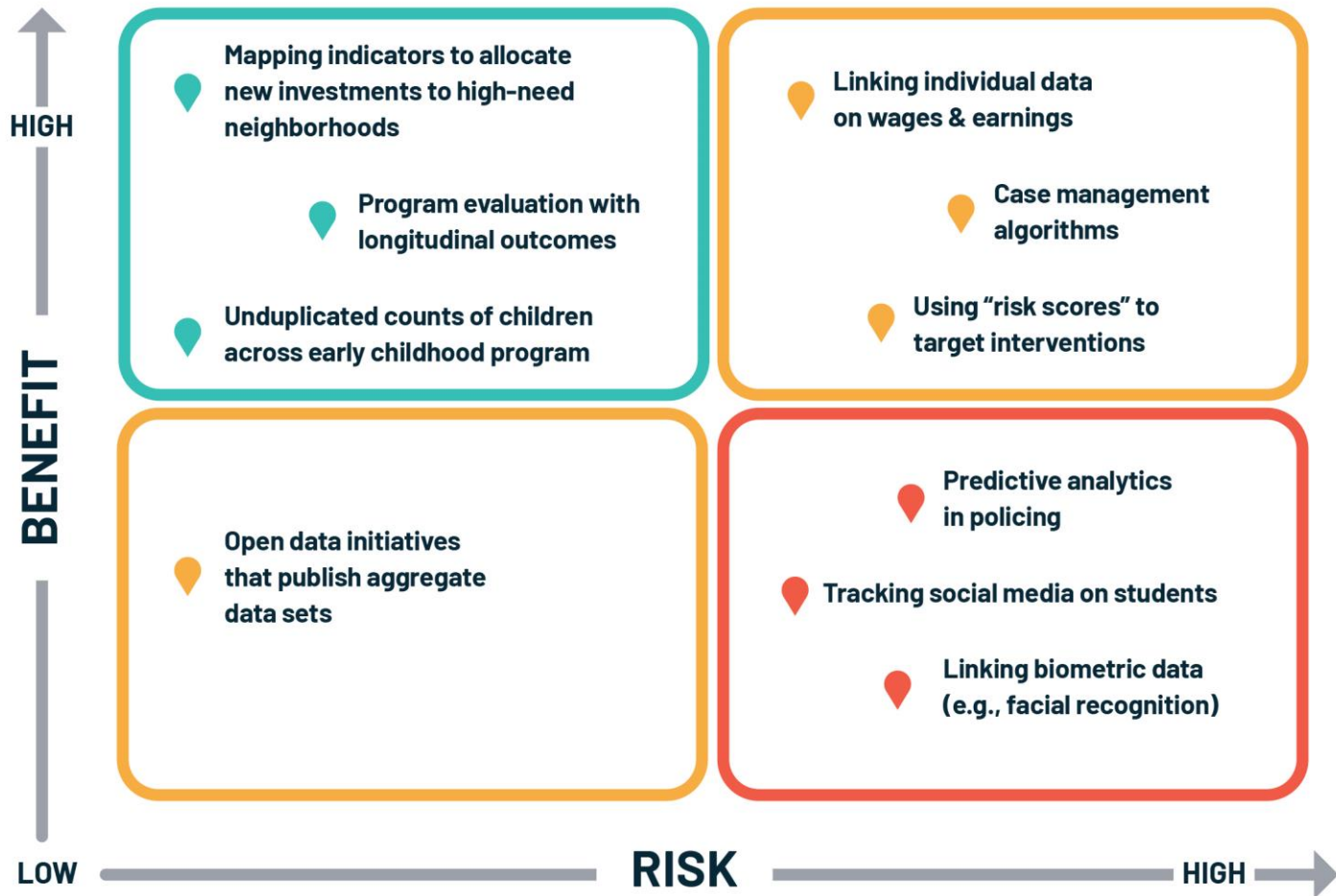
What type of data do you want to share and integrate? (Is it open, restricted, or unavailable?)

How will you share the data?

2. Is this ethical?
Social License, Risk v. Benefit

BENEFIT (vertical axis: LOW to HIGH)
RISK (horizontal axis: LOW to HIGH)

Top-left quadrant (teal — high benefit, low risk):
- Mapping indicators to allocate new investments to high-need neighborhoods
- Program evaluation with longitudinal outcomes
- Unduplicated counts of children across early childhood program

Top-right quadrant (orange — high benefit, high risk):
- Linking individual data on wages & earnings
- Case management algorithms
- Using "risk scores" to target interventions

Bottom-left quadrant (orange — low benefit, low risk):
- Open data initiatives that publish aggregate data sets

Bottom-right quadrant (red — low benefit, high risk):
- Predictive analytics in policing
- Tracking social media on students
- Linking biometric data (e.g., facial recognition)

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3. Is this a good idea?
Data availability, Resources, Action

- Are available data of sufficient quality to answer the question at hand?

- What action can be taken as a result of this analysis?

- How will programs/policies/lives be improved by this use of integrated data?

- What can reasonably be changed or improved based upon the findings? What cannot be changed?

- Has this question already been answered?

- Will the resources needed to conduct this integration yield more benefit than using these same resources for programmatic or direct funding?

- Who is conducting this integration and analysis? Do they have sufficient understanding of the program/policy/population that is being studied?

- Who is "asking" the question? Is this topic of interest to the broader community? Do community members, including those "in" the data, know about and support this work?

4. How do we know? Who decides?
Data governance

Data governance: the people, policies, and procedures that support how data are managed, used, and protected.

Strong and inclusive data governance for cross-sector data sharing and integration should be:
- Purpose-, value-, and principle-driven
- Strategically located
- Collaborative
- Iterative
- Transparent

The Role of Data Owners, Data Stewards, and Data Custodians

	Role in data sharing and integration process	Role within agency
Data Owner	Accountable for the quality and security of the data and holds decision-making authority over access and use.	Typically agency leadership that has signatory authority
Data Steward	Responsible for the governance of data, including transfer, alteration, storage, retention, disposition, classification, etc. Includes supporting established processes and policies for access and use, documenting limitations and bias, and maintaining metadata.	Typically subject matter experts and data analysts that regularly work with specific data
Data Custodian	Responsible for the technology used to store, transport, and dispose of data, and for activities and safeguards required to maintain confidentiality, integrity, and availability. Communicates with Steward and Owner regarding any data management issues that pose a risk to data security and/or access.	Typically information technology staff or team

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How: The Legal Agreements

FOUNDATIONAL LEGAL AGREEMENTS

LEGAL AGREEMENT	PURPOSE	PROCESS	SIGNATORY
Memorandum of Understanding MOU *Overarching process document signed on by all data partners*	The MOU documents the purpose and governance process. The MOU will be signed by all data partners as they enter the collaboration. The MOU references the DSA, DUL, and relevant policies, and procedures for data access and use.	Drafted in partnership with legal counsel from all participating data partners	Lead agency/ies + alldata partners
Data Sharing Agreement DSA *Agency-specific to how data will be used for integration*	The DSA includes the specific terms and conditions that govern how data are transferred, stored, and managed when shared and integrated. The DSA references the MOU and the DUL. This document is specific to data held by a data partner.	Template is drafted in partnership with legal counsel from all participating data partners. Completed according to specific data assets of the data partner. Reviewed and updated annually, or as agreed upon.	Lead agency/ies + data partner
Data Use License DUL *Data use–specific once data has been integrated*	The DUL outlines the role and responsibilities of the data recipient. The DUL is often executed after the Data Request Form is approved. The Request Form and/or DUL should include: purpose, data fields, anonymization procedures, dissemination plan, and timeline of project completion. A DUL must be executed prior to data access.	Template is drafted in partnership with legal counsel from all participating data partners. Once data request is approved, a DUL is executed.	Lead agency/ies + data recipient

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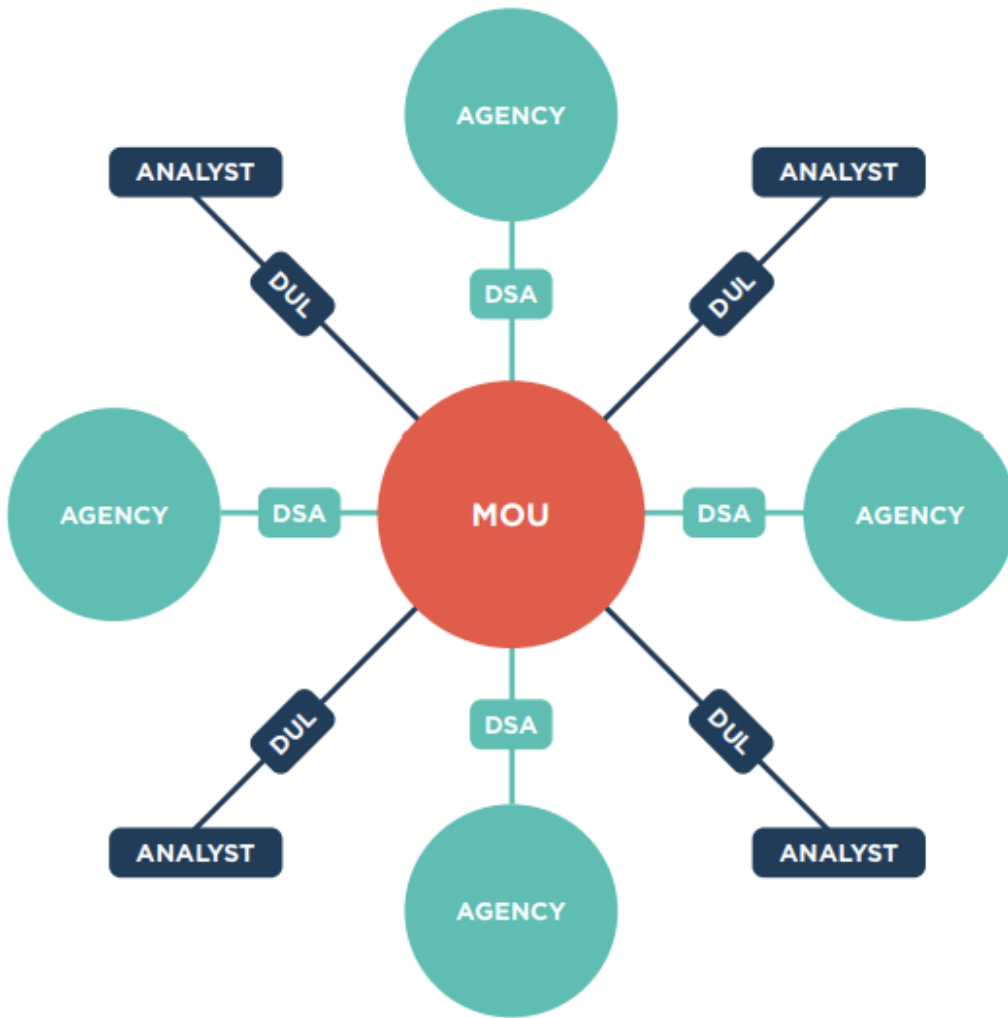
We suggest agreements that are:

Tiered

Standardized but flexible

Transparent and Comprehensible

A Practical Example

Lease = Legal Authority
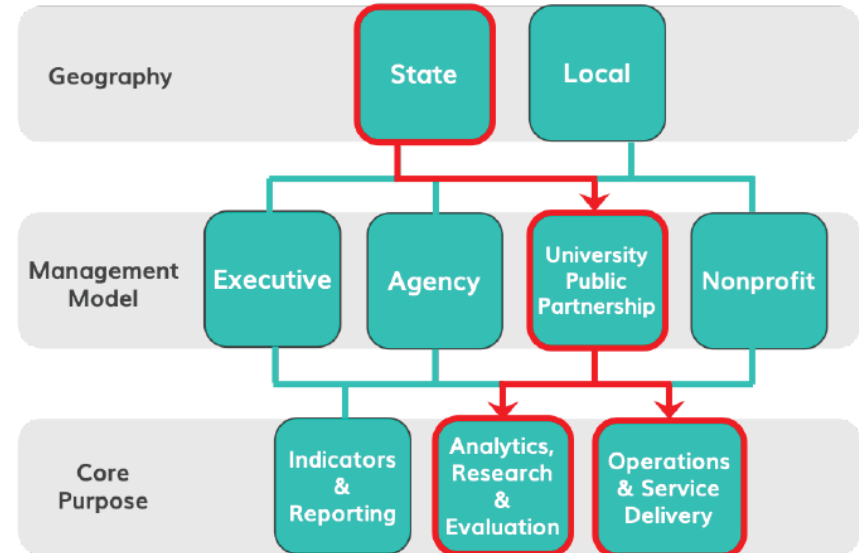
MOU = Roommate Agreement

DSA = Individual Agreement re assets

DUL = Details the use

How: Site examples

Linked Information Network of Colorado (LINC)
University Public Partnership, State

The Linked Information Network of Colorado (LINC) is a collaborative partnership between the Colorado Governor's Office and the Colorado Evaluation Action Lab at The University of Denver. Their capacity for data integration helps strategically target services and benefits to vulnerable populations and identify opportunities to improve services, delivery, and opportunity.

Geography	**State**	**Local**		
Management Model	**Executive**	**Agency**	**University Public Partnership**	**Nonprofit**
Core Purpose	**Indicators & Reporting**	**Analytics, Research & Evaluation**	**Operations & Service Delivery**	

▶ Learn more about LINC here.

Lead Agencies: Governor's Office and University of Denver

Data Partners: Birth and Death Records (CDPHE), Child Welfare (CDHS), Early Intervention (CDHS), Childcare subsidies (CDHS), EC Workforce Data (CDHS), Postsecondary Education (CDHE), Juvenile Justice Services (CDHS), Juvenile Courts (Judicial), Adult Court (Judicial), Denver Police Department (DPD), W-2 Employment and Wages (CLDE), Workforce Training Programs (CDLE), SNAP (CDHS), WIC (CDPHE), Denver Metro Homeless Initiative (HMIS), Denver Public Schools (DPS), see LINC Data Partners

Legal Authority: Contracts (e.g., EMOU, DSA, DUL)

Funding: State, federal, philanthropic partners, fee for service

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Tribal data sovereignty

Tribal Data Sovereignty = inherent right of a nation to govern the ownership, collection, and use of its own data

Tribes have the authority to administer the collection, use and ownership of their own data

Tribes can enter into data sharing agreements with States

Tribes are subject to plenary power of the United States

Overview of appendices

Appendix A- Federal Law and Policy

Appendix B—Selected State & Tribal Laws, Policies and Rules

Appendix C—Sample Executive Orders and Authorizing Legislation Facilitating Data Integration

Appendices D-J—Sample Legal Agreements & Checklists

Questions?

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Check out our publications & quality framework: www.aisp.upenn.edu

Subscribe to our newsletter: https://bit.ly/signupAISPnewsletter

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Implementing a Legal Framework for Data Sharing at the North Carolina Department of Health and Human Services

Paul Hogle, Associate General Counsel and Chief
Records Office, NCDHHS

Overview of NCDHHS

- The North Carolina Department of Health and Human Services manages the delivery of health- and human-related services for all North Carolinians, especially our most vulnerable citizens – children, elderly, disabled and low-income families.

- NCDHHS is divided into 33 divisions and offices that fall under six broad service areas – Health, Opportunity and Well-Being, Medicaid, Operational Excellence, Health Equity, and Policy and Communications.

- NCDHHS also oversees 14 facilities: developmental centers, neuro-medical treatment centers, psychiatric hospitals, alcohol and drug abuse treatment centers, and two residential programs for children.

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NCDHHS Strategic Goals

1. Advance health equity

2. Help North Carolinians end the pandemic, control the spread of COVID-19, recover stronger, and be prepared for future public health crises

3. Build an innovative, coordinated, and whole-person centered system

4. Turn the tide on North Carolina's opioid and substance use crisis.

5. Improve child and family well-being

6. Support individuals with disabilities and older adults in leading safe, healthy and fulfilling lives.

7. Achieve operational excellence by living our values — belonging, joy, people-focused, proactive communication, stewardship, teamwork, and transparency.

Access NCDHHS' s Strategic Goals and 2022-2023 Strategic Plan Here:
https://www.ncdhhs.gov/dhhs-strategic-plan-83121/download?attachment
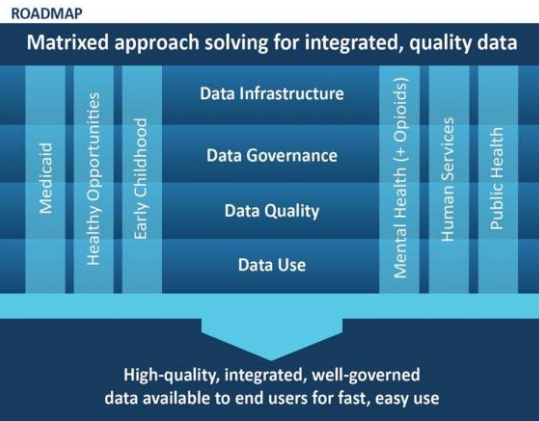
Legal Framework History

2019
- ✓ Staffing of Data Office
- ✓ Data Strategy Development

2020
- ✓ Data Landscape
- ✓ ID key steps to improve data access and use

2021
- ✓ Data Sharing Guidebook
- ✓ Data Request Forms
- ✓ Legal Framework

ROADMAP

Matrixed approach solving for integrated, quality data

Medicaid	Healthy Opportunities	Early Childhood	Data Infrastructure	Mental Health (+ Opioids)	Human Services	Public Health
			Data Governance			
			Data Quality			
			Data Use			

High-quality, integrated, well-governed data available to end users for fast, easy use

Governance Model Summary I July 8, 2019

Hoping you have seen this document?

North Carolina Department of Health and Human Services
Data Landscape Overview

January 2020

Goals of this document:
- Describe perspectives of DHHS staff and contractors in regards to data infrastructure, data governance, data quality, and data use across the DHHS enterprise.
- Identify strengths, weaknesses, opportunities, and threats in regards to infrastructure, governance, quality, and data use to support data strategy development by the DHHS Data Team.

Data Collection Activities:
This Data Landscape Overview has been developed through engagement with NC Department of Health and Human Services staff and contractors via in-person meetings, document review, a survey of data sharing agreements (led by division director and legal counsel), weekly calls with DHHS Data Team, and structured interviews, both in-person and by phone, with 44 individuals from September 2019 to January 2020.

Analytic Approach:
Notes from structured interviews were reviewed multiple times and thematically coded. A theme was not included in this overview document unless mentioned 3+ times by respondents and/or corroborated by another data source (document, meeting, email, etc.).

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Funded by NC Department of Health and Human Services

NC DHHS Data Landscape Overview January 2020   4

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Legal Framework History

November 2021

o Executed Intradepartmental Memorandum of Understanding (IMOU)

January-June 2022

o Draft Division and Office Specific Data Sharing Agreements
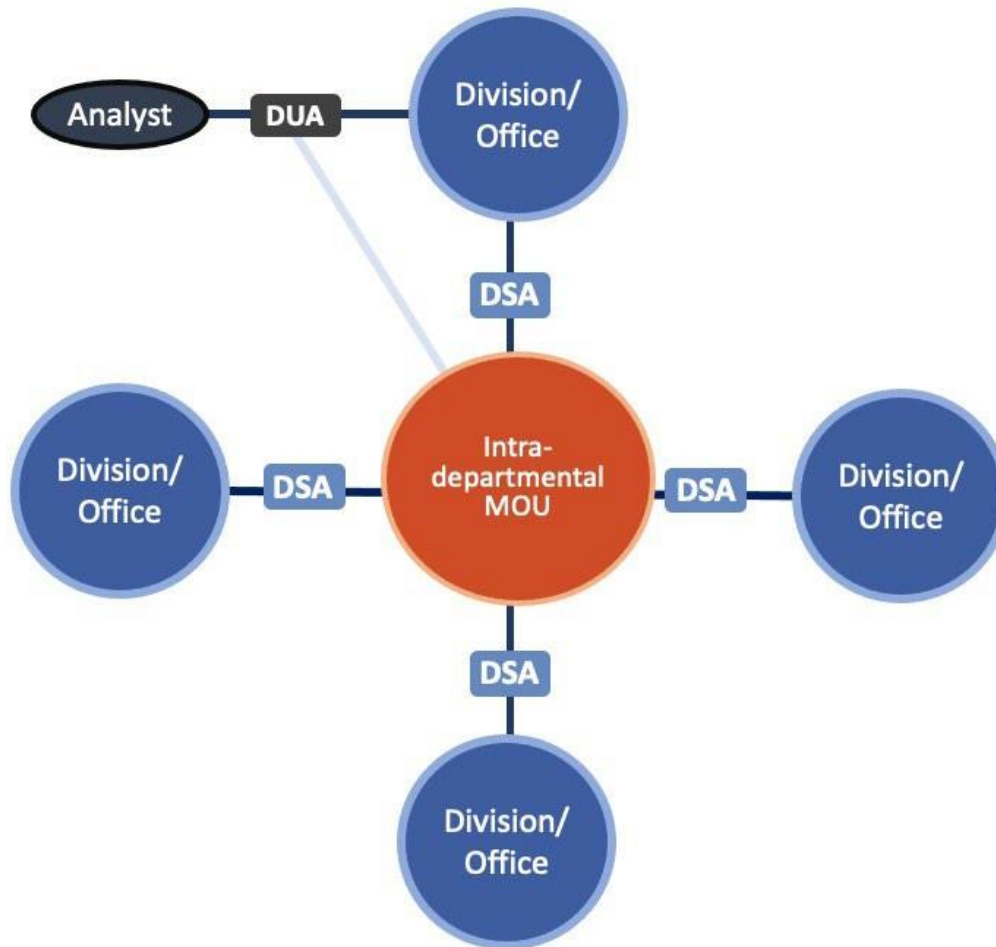o Begin Executing DSAs

July 2022 - Present

o Continuous process improvement
o Demonstrated use cases across all of DHHS
o Executing Remaining DSAs

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**HEALTH AND
HUMAN SERVICES**

The Framework – Foundational Legal Agreements

NCDHHS' s FOUNDATIONAL LEGAL AGREEMENTS

LEGAL DOCUMENT	PURPOSE	PROCESS	SIGNATORY
Intradepartmental MOU *Overarching process and guiding principles document signed by all Divisions / Offices*	• Documents the purpose and governance process. • Is signed by all data partners as they enter the collaboration. • Sets the stage where collaborators understand and agree on the basic premise that data use must be legally complaint, responsible, and only to the extent required. • References the data sharing agreements, data use agreements, policies, and procedures for data access and use (e.g., NCDHHS Data Sharing Guidebook).	Drafted by Data Office, reviewed by legal counsel, signed by Executive Leadership and updated through the NCDHHS Data Governance Council as needed.	All Division and Office Directors and Secretary's Office are parties to 1 agreement
Data Sharing Agreement *Division / Office Specific*	• The DSA includes the specific terms and conditions that govern how division- and office-specific data are transferred, stored, and managed when shared and integrated across the Department. • The DSA references and reinforces the IMOU and the DUA. • It is specific to Division and Office held data and incorporates language around use of data for administrative purposes, which if legally permissible is by default approved unless the data owner decides otherwise.	Drafted by Data Office and Division/Office specific legal counsel. Reviewed and updated annually, or as agreed upon.	1 DSA per Division/Office Signed by Division and Office Director, the Data Office, and Information Technology Division
Data Use Agreement *Data Request Specific*	Legal counsel determines if a DUA is needed for a specific request. The DUA outlines the role and responsibilities of the data recipient. If applicable, this document is attached to the Data Request Form, which includes relevant fields, depending on the request, including: purpose, data fields, anonymization procedures, dissemination plan, and timeline of project completion. A DUA must be executed prior to data access.	Data request is identified by type and reviewed appropriately based upon the type of request. Legal counsel determines if a DUA is applicable. If yes and request is approved, a DUA is executed.	DUAs are used as needed for use cases not covered by DSAs. Signed by Data Recipient and Data Owners (if applicable)

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The below illustrates the intradepartmental legal agreements used to govern data access and use **across** NCDHHS Divisions and Offices and Programs.
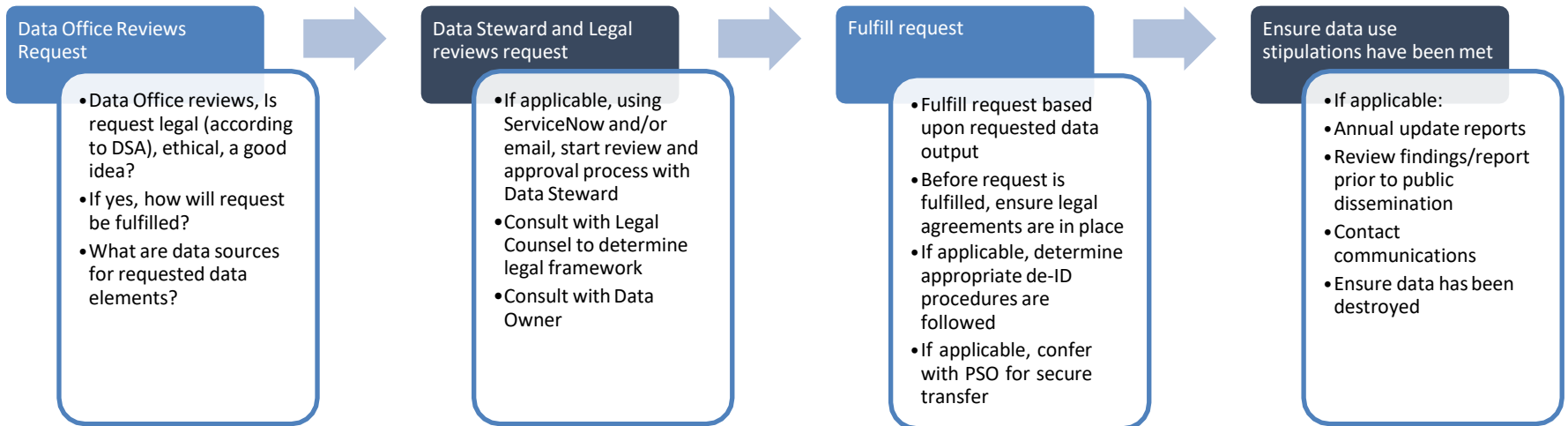
Data Request Process for Data Requestors

Planning
- Clarify purpose, use, and minimal data needed
- Determine analytic plan

Request
- Determine type of request & role of requestor
- Complete and submit ODRF

Access
- A DUA many need to be signed before access is granted.
- If approved, receive access

Analyze
- Follow analytic plan
- Support metadata documentation

Dissemination
- Follow dissemination plan (may include external review prior to release)

Data Destruction
- Follow data management expectations (including data destruction guidelines)

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Data Request Process For Request Recipients
(including Data Steward, Data Owner or Designee, & Data Custodian)

Data Office Reviews Request

- Data Office reviews, Is request legal (according to DSA), ethical, a good idea?
- If yes, how will request be fulfilled?
- What are data sources for requested data elements?

Data Steward and Legal reviews request

- If applicable, using ServiceNow and/or email, start review and approval process with Data Steward
- Consult with Legal Counsel to determine legal framework
- Consult with Data Owner

Fulfill request

- Fulfill request based upon requested data output
- Before request is fulfilled, ensure legal agreements are in place
- If applicable, determine appropriate de-ID procedures are followed
- If applicable, confer with PSO for secure transfer

Ensure data use stipulations have been met

- If applicable:
- Annual update reports
- Review findings/report prior to public dissemination
- Contact communications
- Ensure data has been destroyed

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NCDHHS Data Sharing Guidebook

NCDHHS Staff in collaboration with AISP created a guidebook for requestors and data owners that includes:

- **The legal framework** for internal and external sharing and integration, including an overview of relevant federal and state statute and rules
- **General data classification guidance** (open, restricted, unavailable) that correspond to North Carolina's statewide data classification system.
- **Overview of department roles** that support data sharing and use to better understand purposes and best legal practices
- **Department priorities** for data access & use
- **NCDHHS high value data asset inventory**
- **NCDHHS data request process** for 9 common pathways, operational requests being the most common
- Links to forms and templates.

Access NCDHHS Data Sharing Guidebook Here: https://www.ncdhhs.gov/about/administrative-offices/data-office/data-sharing-guidebook

Key Points:

➢ Data use is only possible within a strong data governance model enabled by a robust legal framework.

➢ The framework encourages uniformity in process, drafting, and decision-making, which create efficiencies and reduces turnaround times, particularly for routine data uses.

➢ Our legal framework corrects assumed barriers to data use while ensuring compliance with applicable law and policy.

➢ Compliance and risk mitigation are baked in from the beginning, not considered or added on the back-end.

➢ The Legal Framework is intentionally flexible.

➢ Legal Counsel are guiding the use of the framework.

➢ The legal framework directly impacts social license to operate, benefitting both legal operations and our programs.

NCDHHS Data Sharing Guidebook

North Carolina Department of Health and Human Services
NCDHHS Operational Data Request Form

This request is related to ongoing work of NCDHHS that supports business intelligence with a NCDHHS division or office, department and/or strategic partner (under current agreement with NCDHHS), including local offices.

Submit this form and any questions by email to dataoffice@dhhs.nc.gov

Internal Use. Request #:

1. Does this data request align with NCDHHS priorities and support business intelligence of NCDHHS?

☐ Yes ☐ No ☐ Unsure

2. What is the main purpose of this operational data request?

☐ Reporting ☐ Quality Improvement ☐ Evaluation

☐ Legal Implications ☐ Health Care Operations, Payment, and Treatment

☐ Other: (please specify)

Please describe the purpose of this request and how data will be used to support operations of NCDHHS:

3. Why does this request involve the NCDHHS Data Office?

☐ I am requesting data from 1 Division/Office, and there is not a Division/Office specific process

☐ I am requesting integrated data from across NCDHHS Divisions/Offices.

☐ I am requesting identifiable records for the purpose of integrating data from NCDHHS with another data source.

☐ I'm not sure. I would need to discuss my data request with someone.

☐ Other: (please specify)

4. Requestor's Contact Information

Name of Requestor:

Title / Role:

NCDHHS Division / Office, or Institution / Agency

If request is a part of contract with NCDHHS, and you are not NCDHHS staff, please check here. ☐

If yes, what is the term of your contract? (MM/DD/YY to MM/DD/YY)

Phone number: Email:

I have read and agree to the NCDHHS Terms and Conditions of Data Use Yes ☐

5. Description of the Requested Data

How often does the Recipient want to receive data?
☐ This will be a one-time provision of data
☐ Daily ☐ Weekly
☐ Other

NC DEPARTMENT OF
HEALTH AND HUMAN SERVICES

Questions?

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North Carolina Department of Health & Human Services

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Amy Hawn Nelson, PhD

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(member of NCDHHS Data Office since 2019)

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P20 WIN Legal Framework and Data Governance

Richard Gold

Consultant to Connecticut Office of Policy & Management

P20 WIN

P20 WIN (The Preschool through 20 Workforce Information Network) is Connecticut's state longitudinal data system and is the mechanism by which data from multiple agencies are matched to address critical policy questions.

P20 WIN informs sound policies and practice through secure sharing of longitudinal data across participating agencies to ensure that individuals successfully navigate supportive services and educational pathways into the workforce.

OVERVIEW

- P20 WIN is a federated data system that has been operational since 2014. P20 WIN is used to answer policy questions, fulfill federal and state reporting requirements; support program review; inform school districts of postsecondary outcomes; provide employment and wage outcome data; and support research and analysis on a variety of topics.
- P20 WIN is codified [Sec. 10a-57g](#) of the Connecticut General Statutes and establishes decision-making processes while giving the P20 WIN Executive Board the ability to establish committees as needed.

P20·WIN

ADMINISTRATION

Operating Group

▸ P20 WIN is administered by the Office of Policy and Management (OPM). As the Operating Group, OPM provides program management to support the continued operation and improvement of P20 WIN as a resource for the participating agencies and the State.

Data Integration Hub

▸ The Data Integration Hub for P20 WIN is based at the Department of Labor, where all matching for approved requests happens.
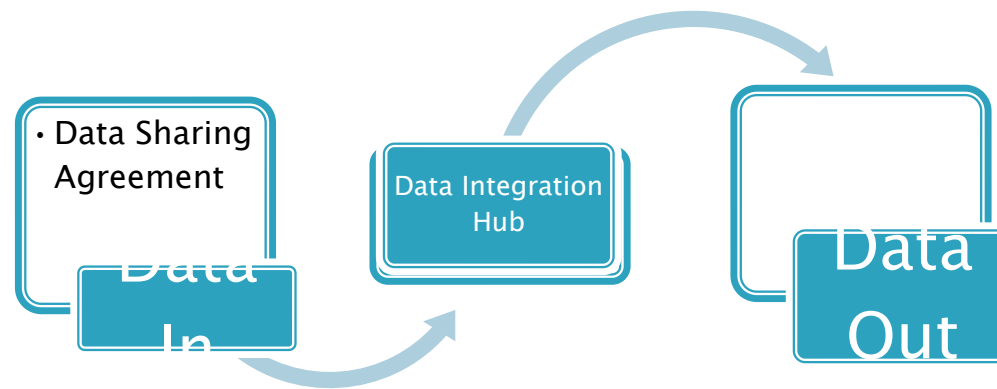
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DATA PARTICIPATING AGENCIES

- Department of Labor (DOL)
- CT State Department of Education (CSDE)
- Department of Children and Families (DCF)
- Department of Social Services (DSS)
- Office of Early Childhood (OEC)
- Office of Higher Education (OHE)
- CT Conference of Independent Colleges (CCIC)
- CT State Colleges and Universities (CSCU)
- University of Connecticut (Uconn)
- CT Coalition to End Homelessness (CCEH)

- Department of Mental Health and Addiction Services (DMHAS)
- CT Technical Education and Career System (CTECS)
- Department of Corrections (DOC)
- Judicial Branch Court Support Services (JBCSSD)

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Legal Agreements

- Enterprise Memorandum of Understanding (eMOU)
- Data Sharing Agreement (DSA)
- Each document has different signatories and serves different purposes.

- Data Sharing Agreement

Data In

Data Integration Hub

Data Out

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Enterprise Memorandum of Understanding (eMOU)
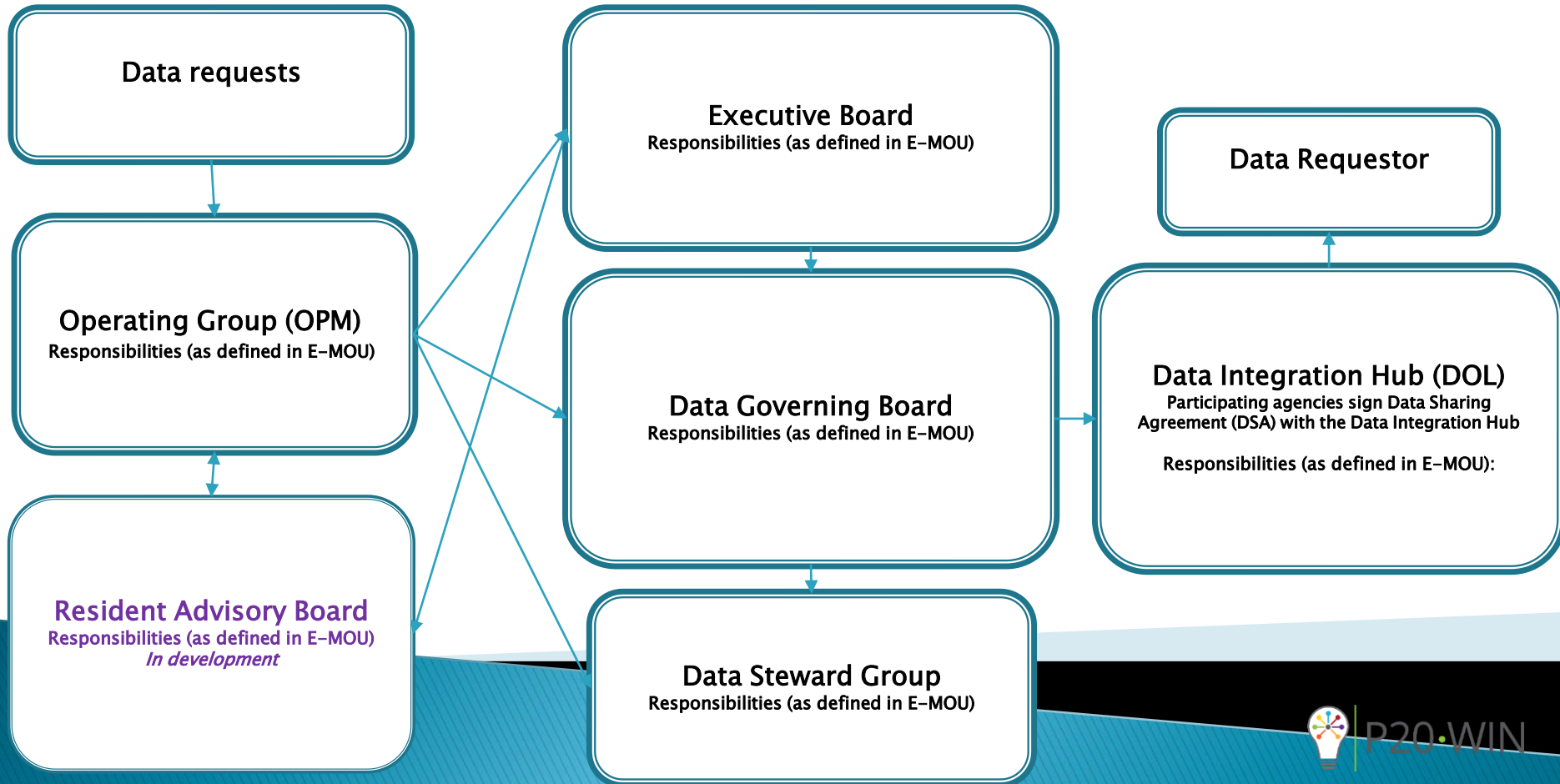
- Outlines the rules of the road that all participating agencies agree to.
- The eMOU outlines the governance structure of P20 WIN, the technical processes, security and privacy standards.
- Does <u>not</u> include regulations and laws that are specific to a particular dataset/state agency.
- Signed by executive leadership for each Participating Agency.

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Data Sharing Agreement (DSA)

Adapted & combined the AISP Data Sharing Agreement and the Data Use License into a single document that includes all parties to specific, approved data request

- Clearly details what data are being shared and how the data can be used.
- Templates include provisions concerning access and dissemination for specific datasets at each agency.
- The P20 WIN DSA includes:
  - Requirements to access to specific data
  - Specific confidentiality/security requirements and disclaimers
  - Time limits

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P20 WIN 2.0 – Proposed Legal and Governance Framework

Data requests

Operating Group (OPM)
Responsibilities (as defined in E–MOU)

Resident Advisory Board
Responsibilities (as defined in E–MOU)
In development

Executive Board
Responsibilities (as defined in E–MOU)

Data Governing Board
Responsibilities (as defined in E–MOU)

Data Steward Group
Responsibilities (as defined in E–MOU)

Data Requestor

Data Integration Hub (DOL)
Participating agencies sign Data Sharing Agreement (DSA) with the Data Integration Hub

Responsibilities (as defined in E–MOU):

P20 WIN Governance Structure

Executive Board
(Leadership from participating state agencies)
Responsibilities:
- Advances vision, mission and purpose
- Advance priorities for research, evaluation and case management
- Champions system implementation, maintenance and improvement
- Fiscal and policy responsibility

Operating Group
Responsibilities:
- Develops and submits budget requests
- Program management and operations
- Financial and back-office support
- Convenes governing bodies
- Receives and reviews data requests
- Track data use and enforce data destruction policy

Data requests
For: Research, cross-agency link/match, case Management
From: State agencies, academics, nonprofits, etc.

Data Steward Group
Responsibilities:
- Implements data system policies
- Define data standards, data cleaning processes, metadata
- Evaluate data quality and data matching

Data Governing Board
Responsibilities:
- Establishes data governance policies
- Establishes process for requesting, processing, and downloading data
- Reviews and approves requests for data
- Provides agency data
- Sets parameters for data access, dissemination, and destruction

Data Integration Hub
Responsibilities:
- Cleans and de-identifies data, and sends data back to requester
- Documents receipt and destruction of files
- Conducts cross-agency data matching/linking
- Integrated case management

Resident Advisory Board
(in development)
- Recipients & consumers of state services, parents, youth
- Advises state agencies in earning public trust.
- Reviews requests for equity and disparate impact on clients/ consumers/ families

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