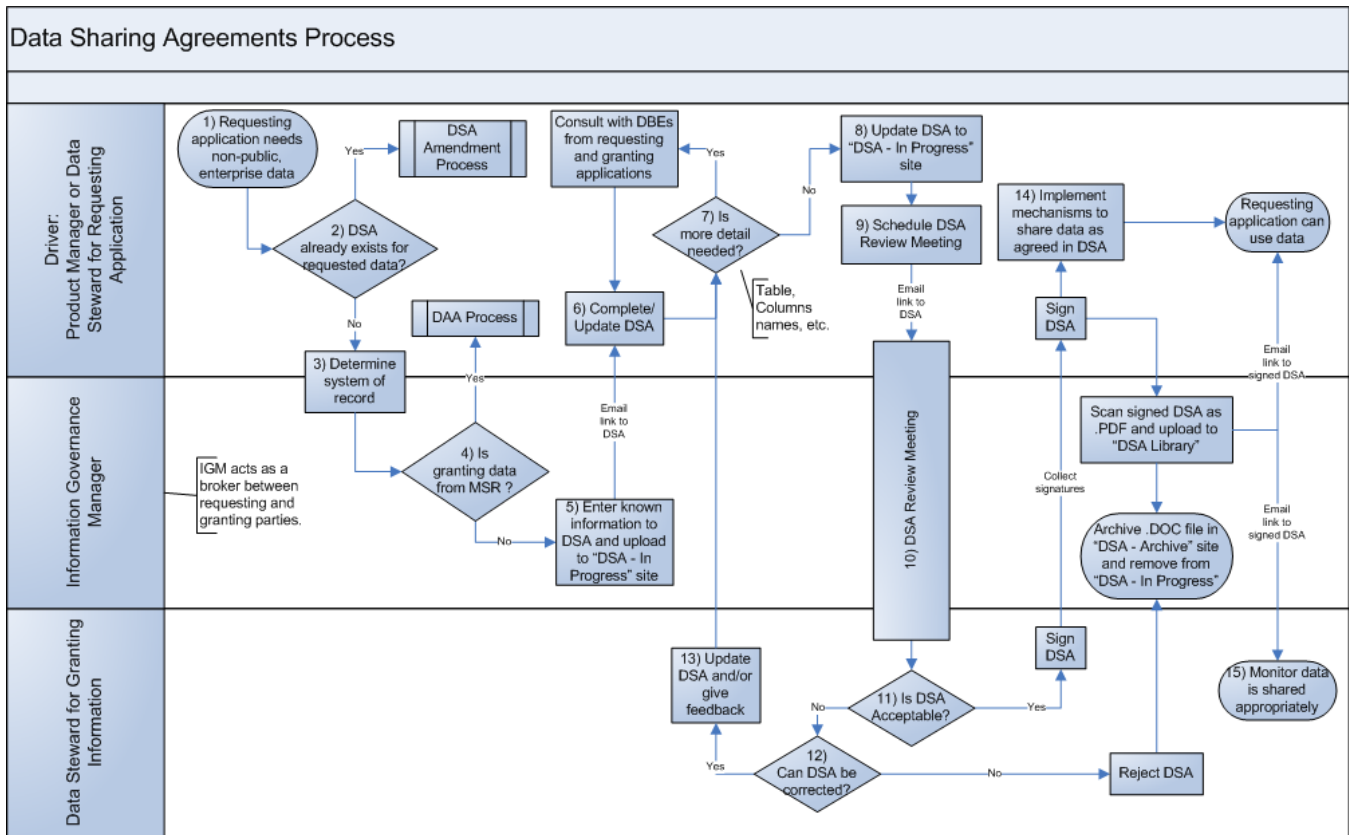


# Data Sharing Agreement Process

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## Process:

1. Ideally, the need for enterprise data in an application is identified during the Plan phase of a project when doing the application's Conceptual Data Model. A Data Sharing Agreements (DSA) is necessary for sharing data between departments. The DSA formalizes the agreement and describes the mechanisms for sharing this data. Reference (public) data can be replicated from the Master Data Management (MDM) repository without the need for a DSA.
2. Requestor checks existing DSAs for the requesting application to see if there is already a DSA between the requesting and granting applications (see \*\*DSA Library for the list of existing DSAs). If a DSA exists but does not grant access to the requested information, then the DSA needs to be amended (see DSA Amendment Process).
3. If a new DSA is needed, the Requestor needs to determine the system of record that is the source for the requested information (granting application). If the requested data comes from several systems of record, the Requestor may need to draft several DSAs. The Information Governance Manager (IGM) can assist the Requestor to determine the system(s) of record and what DSAs are needed.
4. If the requested data is from a Membership and Statistical Records (MSR) system (CDOL, CMIS, etc.), the Requestor must begin a slightly different process with MSR directly (see \*\*Data Access Agreement Process).

5. IGM enters known information into the [DSA template](#) (i.e., Requesting and Granting applications, Data Steward, Program Manager, etc.). He then uploads the partially complete DSA to the “[DSA – In Progress](#)” library renaming the file appropriately and emails the DSA’s link to the Requestor.
6. The Requestor is responsible to complete the DSA document filling in sections A, B, and C. The IGM also can assist the Requestor with completing these sections.
7. If the Requestor doesn’t have all necessary information he/she should work with the database engineers or product managers for both the requesting and granting applications.
8. Once the DSA is in an appropriate format, the Requestor again uploads it to the “DSA – In Progress” library.
9. The Requestor schedules a review meeting with the granting data steward and the information governance manager. He includes the date, time, and place of the meeting, as well as the name and location of the DSA in the email (or attaches the DSA to the email).
10. The DSA Review Meeting is held to assure that all parties agree on the specifics of the Data Sharing Agreement as well as identify any potential problems or shortcomings. Typical issues to discuss during this meeting are among the following:
  - a. What will be the specific mechanisms to implement the sharing of this data?
  - b. Who is going to implement these mechanisms?
  - c. How will the requesting application ensure that the data is only used in an authorized manner?
  - d. Does the DSA explicitly document these decisions? If not, the DSA should be modified to meet the stakeholder’s expectations.
11. The granting Data Steward determines whether the DSA is appropriate for signing. Any special conditions need to be met before granting data access, these conditions should be documented in Section D of the DSA. If the DSA is appropriate, the interested parties will sign at this time. The IGM will scan the signed DSA and archive appropriately.
12. If the request is not approved, the Data Steward determines whether the request is rejected due to insufficient information or due to the request being materially inappropriate. If the latter is the case, the Data Steward must either determine whether special approval should be obtained from higher authority, or whether the request should be rejected.
13. If the rejection is due to insufficient information, the Data Steward should communicate this to the Requestor and the Requestor then repeats steps 6-10 to ensure all aspects of the DSA meet the Data Steward’s requirements.
14. When the DSA is signed, the Requestor implements mechanisms to share data as agreed in the DSA.
15. The Data Steward monitors the implementation to ensure correct sharing.

## ***Defining Roles:***

### **Requestor: Product Manager or Program Manager for Requesting Application**

The business contact for the requesting application; should be a party with a vested interest in obtaining the data and a representative of the project team from the requesting organization; should NOT be an ICS technical representative. This person also performs most of the drafting and processing behind Data Sharing Agreements.

### **Information Governance Manager**

ICS Manager responsible for documenting and monitoring sharing of data across departments and assuring that best practices are followed. This person acts as a broker between the Requestor and requesting Data Steward, facilitating the exchange of information and helping each party meet their needs within IT policies and principles for information governance.

### **Data Steward for Granting Application**

The person, designated from within the granting application's department, responsible for ensuring proper access and use of the application's data.