UW Data Management Procedures
Document

Applies To: All Departments and Units of the University

Authorities: UW Data Management Committee (DMC)

Issued By: Chair of the Data Management Committee

Administered By: DMC, Standards Implementation Committee (STIC)

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Purpose

This UW Data Management Procedure document, in association with the UW Data Management Standards document, sets forth best practices and standards in regards to management of Institutional Data assets. It provides explanations of usual and customary practices of the Data Management Committee as well as guidance on typical data management challenges at the UW.

Scope

The scope of this document is the same as defined in the UW Institutional Data Management Standards document. (see reference 2 below) That document describes principles, definitions, roles and responsibilities of the Data Management Committee as well as Data Custodians and Data Trustees. For a list of the current Data Custodians and Data Trustees refer to the UW Data Map on the Data Management Committee web site. (see reference 1 below)

DMC Administration Procedures

Data Management Committee members are appointed by Provost Charge letters. Time commitments and terms are not explicitly defined in the charge letter. Membership is reviewed by the current Chair, Co-Chair, and STIC representatives on an annual basis and adjustments are made according to committee members interests and availability. Members are allowed to send one substitute delegate to meetings in their place as appropriate.

UW Employees that are leads or regular participants in DMC task force sub-committees may be listed as adjunct DMC members on the DMC web site and attend DMC meetings on a regular basis.

In matters that require DMC approval or endorsement, a simple majority vote of a quorum of DMC members at a meeting will constitute acceptance. Official actions will be recorded in the meeting minutes and posted on the DMC web site.
DMC meetings are typically held every 2 weeks throughout the year. The Chair and Co-Chair at their discretion may cancel meetings as circumstances dictate.

**STIC Administration Procedures**

The Standards Implementation Committee, which serves as a steering group of the DMC, will meet on a similar meeting schedule as the DMC. STIC members are a subset of the DMC members and membership is by invitation of the Chair and Co-Chair of the DMC. STIC membership will be reviewed on an annual basis. Administrative assistants of STIC members may also be actively involved in STIC administration procedures.

STIC members, and/or their administrative assistants, are assigned to and responsible for monitoring and responding to issues sent to the dmc-support@uw.edu mailman listserv. This is the primary email support channel that is published on the DMC web site. STIC members and their administrative assistants will collaborate and coordinate on reviewing and responding to issues in order to ensure timely responses to issues.

STIC members are responsible for maintaining official DMC documents on the UW-IT SharePoint web site. (see reference 3 below) They also coordinate DMC web site changes by sending update requests to UW-IT Communications Team at cg-request@uw.edu.

STIC members are responsible for maintaining the UW Data Map and the corresponding Data Custodian and Trustee assignments. A master copy spreadsheet of the UW Data Map is maintained on the UW-IT SharePoint site. All changes to the master spreadsheet must also be reflected on the DMC web site by following the procedure described above.

**Request and/or Exemption Procedures**

Non standard Institutional data access and use requests, as well as exemptions to any UW Data Management Standards, will be governed using the following processes.
Standard Request and/or Exemption Process

Individuals will submit formal written requests and/or exemptions to either the Standards Implementation Committee (STIC) or directly to the appropriate Data Custodian(s). The following review process will then occur:

a) For issues that have clearly defined precedents, the STIC or Data Custodians will either grant or deny the request and communicate back to the requestor.

b) For issues that require further interpretation the STIC assigns the request to the appropriate Data Custodian(s). The Data Custodian(s) review and interpret the request against all relevant policies and procedures. Then Data Custodian(s) document a decision and either grant or deny the request and communicate the decision back to the STIC, which records the decision and communicates it back to the requestor. If the request is denied Data Custodians may offer an alternative method or solution that fulfills the request.

c) For requests that are difficult to interpret, and fall outside of any defined precedents, the Requestors and/or Data Custodian(s) may request additional “Advisory Opinions” from appropriate advisory bodies. (i.e. PASS Council, Records Retention Office, Attorney General’s Office, etc.) The issue, along with all advisory opinions obtained, are escalated to the appropriate Data Trustee(s) and/or the Data Management Committee (DMC).

d) All new advisory opinions, precedents, and interpretations are communicated back to the STIC, which records the decision and communicates it back to the Requestor.
Request and/or Exemption Appeal Process

Individuals that receive a denial to their initial request may appeal the decision according to the following review process:

a) Requestors are required to prepare a written “business case” justification for their request that clearly outlines both benefits and drawbacks for the request and/or exemption. Requestors should work with the STIC and/or Data Custodians regarding expectations for preparing the business case justification.

b) The STIC and/or Data Custodians present to the appropriate Data Trustee(s) and/or the DMC all relevant documentation regarding the appeal request, including the business case justification, and all advisory opinions previously gathered.

c) The Data Trustee(s) and/or DMC after reviewing the new documentation may either grant or deny the appeal request and communicate the decision back to the STIC and Data Custodians, or submit all documentation to an appropriate Executive Officer.

d) Executive Officers are the supervisors of the corresponding Data Trustees (i.e. the President, Provost, or Senior Vice President) They will review all documentation regarding the appeal request and issue a final decision. The decision is communicated back to the STIC who records the final decision and communicates it back to the requestor.

Request and/or Exemption Criteria

To help inform the appeal process requestors should consider the following “criteria” and “questions” when submitting an appeal request.

- Is the request related to disagreements in the ownership, interpretation, meaning or sensitivity of data?
- Is the request related to disagreements in the level of perceived risk in usage or access of data?
- Does the request involve a single individual person, college or school, campus, or department, or is it broadly applicable across the entire University?
- Is the request for a fixed duration in time or ongoing?
- Does the request require special support, or place additional burdens, beyond traditional data management operations and procedures, to implement, maintain and monitor?
Does the request involve data that is owned or derived by an entity other than the University?
Is the request related to legislative and compliance mandates that are subject to change from time to time?

**Arbitration of Data Definitions Procedures**

Requests to change the definitions of Institutional Data, or Institutional Metadata, which is recorded on the DMC web site, should be sent directly to the relevant Data Custodian(s). (see reference 1 below for current Data Custodian assignments) Data Custodians will then inform the STIC of changes that are relevant and necessary to be recorded on the DMC web site.

**Procedures for Requesting Copies of Institutional Data**

Any department, unit, or individual that would like to make a copy of Institutional Data shall make a formal written request to the Data Custodian(s) of the subject area they are requesting. The written request must include the following information:

- The business value and need for the copy
- The person(s) that is responsible for maintaining the copy
- The operational procedures that will be used to safeguard the copy

As outlined in the Data Management Standard document, anyone responsible for copies of Institutional Data must be aware of and follow all the relevant policies and procedures set by the DMC in the management and use of Institutional data.

For additional guidance on making copies of Institutional Data refer to the DMC Guidance Document 1002. (see reference 1 below)

**Roles and User Access Procedures**

Access and use of Institutional Data will be administered by the appropriate Data Custodian(s) according to the specific subject area of data being requested. Individuals or groups should contact the appropriate Data Custodian(s) according to the subject area they are requesting access to. Data Custodians will follow the following standards and guidelines for administration of access requests and will make sure that the end users are aware when their requests involve confidential or restricted data.

- To the extent possible Data Custodians will assign individual users to predefined "access roles" which are documented and published on the DMC web site.
- Data Custodians will define and create new "access roles" as necessary from time to time.
- When new access roles are defined the Data Custodians will inform the STIC which will record that role on the DMC web site.
- Data Custodians will educate users on appropriate access and use guidelines, and gather signatures on appropriate access and use request forms.
- Data Custodians will inform all appropriate system administrators and system operators of new or changed access roles and coordinate the setup and configuration of those roles within appropriate authorization and authentication systems at the University.
Data Classification Procedures

All Institutional Data will be classified for both security and organizational purposes. Data Custodians are responsible for helping to classify the Institutional Data assets of the University. Classifications are recorded in a variety of systems and formats. For consistency, Data Custodians should encourage and enforce the classification of data according to the subject areas and business process domains of the UW Data Map published on the Data Management Committee web site. All Institutional Data must also be classified for security and privacy reasons as outlined in the UW System Security and Minimum Data Security Standards policy documents (see reference 4 below). These policies require adherence to principles such as “access of least privilege” and “separation of duty”. Data Custodians, when creating new “access roles”, mentioned above in the previous section must follow these principles and guidelines.

Security and Privacy Administration Procedures

Members of the designated DMC Access and Roles sub-committee, or their delegates, in conjunction with Data Custodians, are responsible for performing regular reviews of the security access standards and guidelines outlined in the DMC Access and Roles Matrix published on the DMC web site. This includes review of users to verify membership in roles and appropriateness of that access. Refer to DMC Guideline 1021 “EDW End User Access Review” for best practices on conducting the review.

Training and Education Procedures

The DMC is responsible for creating, delivering and maintaining necessary training and education to Data Management personnel. It will provide online training and deliver periodic education forums. Data Custodians are responsible for sharing and providing education and training as appropriate to end users of Institutional Data in order to verify the end users proper handling and knowledge of the data.

Procedures for Requesting Institutional Data Improvements

Anyone may make requests for improving the integrity of Institutional Data by submitting a written request to the STIC or Data Custodian(s). The STIC will coordinate the request with the DMC, and all other Office of Information Management governance bodies. The Data Management Committee will consider and incorporate necessary changes to the Data Management Policy and Procedure documents as a result of improvement requests.

Procedures for Requesting Institutional Data Reports

The DMC is responsible for helping to organize and announce the availability of Institutional Data Reports. Users seeking clarification of Institutional Reports should contact a STIC member or appropriate Data Custodian. Users requesting changes to, or new types of, Institutional Data Reports should contact the Data Custodian(s) responsible for the coordination and production of that report. Data Custodians are responsible for communicating changes to existing reports, or
creation of new reports, to a STIC member for documenting and including appropriate materials on
the DMC web site.

References

1. UW Data Management Committee web site  http://www.washington.edu/uwit/im/dmc/
2. UW Institutional Data Management Standards document  
3. UW-IT DMC Sharepoint administration site  
4. UW Information Systems Security Policy  
   http://www.washington.edu/admin/rules/APS/02.01.5.html