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UW Data Management Guidelines and Procedures Document

This UW Data Management Guidelines and Procedure document, in association with the UW Data Management Policy Statement, sets forth best practices and standards in regards to management of Institutional Data assets.

Applies To: All Departments and Units of the University

Issued By: Provost and Vice Provost for Information Management / Chief Information Officer

Administered By: Policy Implementation Committee

Authorities: UW Data Management Committee

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Purpose

The University of Washington understands the strategic importance of Institutional Data and defines the following goals for the proper maintenance, protection, and use of those data.

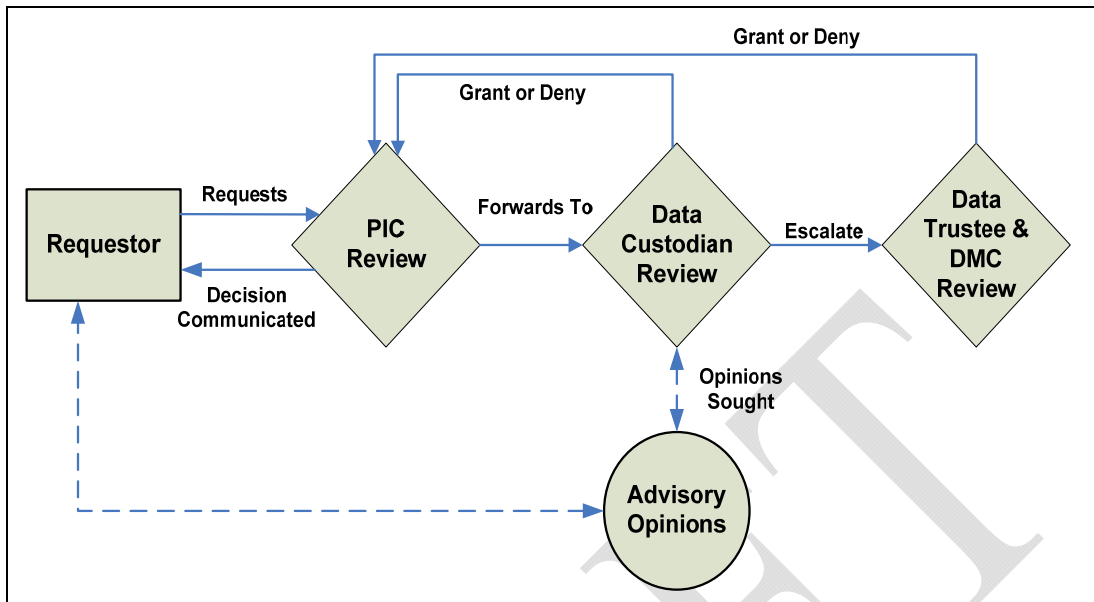
- Ensure establishment, management and accessibility of institutional data in electronic format regardless of where that data resides
- Maximize the value of institutional data by increasing the understanding and use of that data
- Support the University's strategic goals to incorporate information management as a part of decision making and delivery of services
- Define and educate users with regards to all University, State, and Federal laws and policies that mandate and regulate data assets
- Clearly define who is responsible for management of the data and what roles they play

University leaders understand there is a cost to ensure appropriate use and protection of data. Implementation of the following procedures helps control costs and reduces risks associated with the management of these important assets. This Guideline and Procedure document is a companion to the Data Management Policy documented in the University Administrative Policy Statement database. <<insert url link here once available>> For definitions of key terms please refer to the policy document.

Procedures

1. **Grant of Requests and Exemptions** – Institutional data access and use requests, as well as exemptions to any UW Data Management policies and procedures, will be governed using the following processes.

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1.1 Standard Request and/or Exemption Process

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

- For issues that have clearly defined precedents, the PIC or Data Custodians will either grant or deny the request and communicate back to the requestor.
- For issues that require further interpretation the PIC 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 PIC, which records the decision and communicates it back to the requestor.
- 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 the Data Management Committee (DMC).
- All new advisory opinions, precedents, and interpretations are communicated back to the PIC, which records the decision and communicates it back to the Requestor.

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- Is the request related to legislative and compliance mandates that are subject to change from time to time?

2. **Arbitration of Definitions** – 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). (Refer to reference 1 below for current Data Custodian assignments) Data Custodians will then inform the PIC of changes that are relevant and necessary to be recorded on the DMC web site
3. **Making 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 are responsible for maintaining the copy
 - The operational procedures that will be used to safeguard the copy

As outlined in the Data Management Policy 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. <<insert url link here>>

4. **Authorization of Use** – 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 PIC 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.
5. **Data Classification** – 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 (refer to reference 2 below) These policies require adherence to principles such as “access of least privilege” and “separation of duty”. Data

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Custodians, when creating new "access roles" mentioned in item 4 above, must follow these principles and guidelines.

6. **Security and Privacy Administration** – Data Custodians, in conjunction with the Internal Audit department, are responsible for performing regular audits of the data management and security access standards and guidelines and verify membership within groups or roles as appropriate.
7. **Training and Certification** – Data Custodians will provide 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.
8. **Requesting Institutional Data Improvements** – Anyone may make requests for improving the integrity of Institutional Data by submitting a written request to the PIC or Data Custodian(s). The PIC 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.
9. **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 PIC 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 PIC member for documenting and including appropriate materials on the DMC web site.

References

1. UW Data Management Committee web site <http://www.washington.edu/provost/oim/dmc/>
2. UW Information Systems Security Policy <http://www.washington.edu/admin/rules/APS/02.01.5.html>