

## Data Security Process

### References

- Related Data Policy: Data Security Policy
- Effective Date: 2/3/2023
- Approved By: P20 WIN Data Governing Board

### Purpose

The purpose of this process is to document the steps to ensure that data shared through P20 WIN requests is securely transmitted, stored, and released.

### Applicability

This process applies to all P20 WIN Participating Agencies and all P20 WIN data requestors.

### Definitions

**Questionnaire Library:** Location where all Data Security Questionnaires will be stored and accessed for review by the Participating Agencies.

**Data Requestor:** Any person, entity or organization that submits a data request through P20 WIN for data from two or more Participating Agencies for legitimate state purposes.

**Data Security Questionnaire:** captures the capability of requestors to safeguard data in a secure environment, confirm their understanding of relevant data privacy and security laws and regulations, and agree to strict protocols regarding how the data are used.

**Participating Agency:** Any entity that has executed an enterprise memorandum of understanding for participation in the P20 WIN and has been approved for participation pursuant to the terms of that agreement.

### Implementation

The following steps describe the process to be used collecting and reviewing security questionnaires submitted by data requestors. The standard process is designed to cover most scenarios, but agencies can agree to variations or modifications to this process on a case-by-case basis.

- 1) The Data Governing Board will develop, and regularly review and update, a Data Security Questionnaire for use in the data sharing process. The Questionnaire will be published on the P20 WIN website and made available to any entity upon request.
  - a. The questionnaire will be developed in consultation with security personnel from the participating agencies, and from the Bureau of Information Technology Services (BITS).
- 2) Prior to submitting a data request for review by all participating agencies, data requestors will be prompted to complete a Data Security Questionnaire.

- a. If the data requestor has submitted a Data Security Questionnaire within the prior calendar year, a new questionnaire will not be required.
  - b. If data requestors believe significant changes have been made that will impact their risk assessment, they may submit a new Data Security Questionnaire within the same year.
  - c. OPM will provide support to requestors to complete the questionnaire.
- 3) Data Requestors will complete the Data Security Questionnaire and submit their response to OPM to be included with the Data Request Form and stored in the Questionnaire Library.
  - 4) OPM will distribute the completed Questionnaire and other documentation to Participating Agencies to review the data request. Requestors will be informed that completed questionnaires will be shared with Data Governing Board representatives for any agencies involved in the request, with OPM and with BITS, and that DGB members may choose to share within their organization as needed.
    - a. Questionnaires will not be posted publicly or shared outside the P20 WIN agencies.
  - 5) Each Participating Agency involved in the data request will review the data requestor’s submitted Data Security Questionnaire to confirm if the requestor meets their data security requirements.
  - 6) OPM will incorporate the results of the review as part of the decision-making process for approval of a data request.
    - a. Data requestors will be notified if any agencies found they did not meet their data security requirements, including recommendations on changes to make in order to meet the requirements. Requestors will have the ability to adjust their responses or make improvements to their data security.
    - b. Participating agencies will be notified when the updated questionnaire is available and will again review the data requestor’s submitted Data Security Questionnaire to confirm if the requestor meets their data security requirements.
  - 7) Agencies will indicate approval, rejection or requested revision of the overall request, consistent with the procedures outlined in the E-MOU and Data Governance Manual and will then proceed with Data Sharing Agreements for approved requests.
  - 8) Agencies will then have an ability to monitor changes in data security for the requestors through regular updates to the request, as needed.

**Related Documents/Attachments**

Include document names and URLs. Documents may include other data policies, training materials or other resources, and the related policy document.

**Revision History**

<b>Version Number</b>	<b>Version Date</b>	<b>Description of Change</b>	<b>Point of Contact</b>
1	2/3/2023		