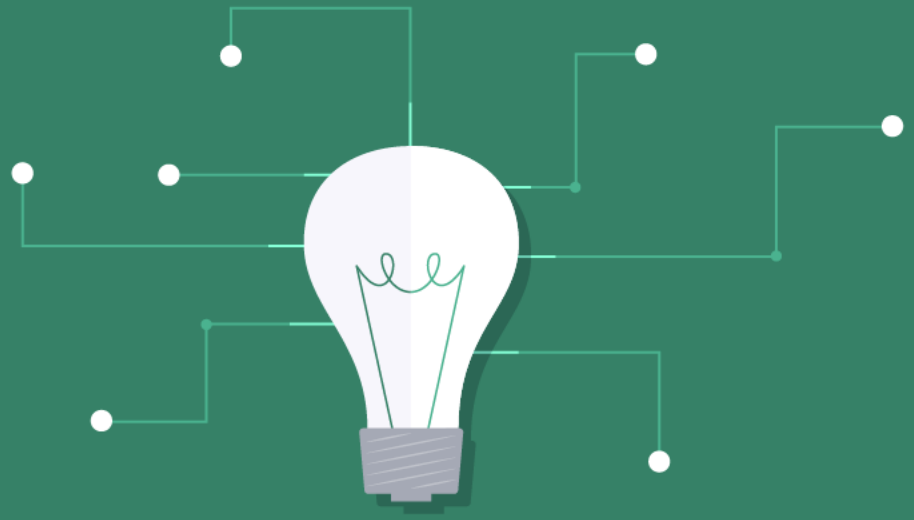

Data Integration Support Center

at WestEd

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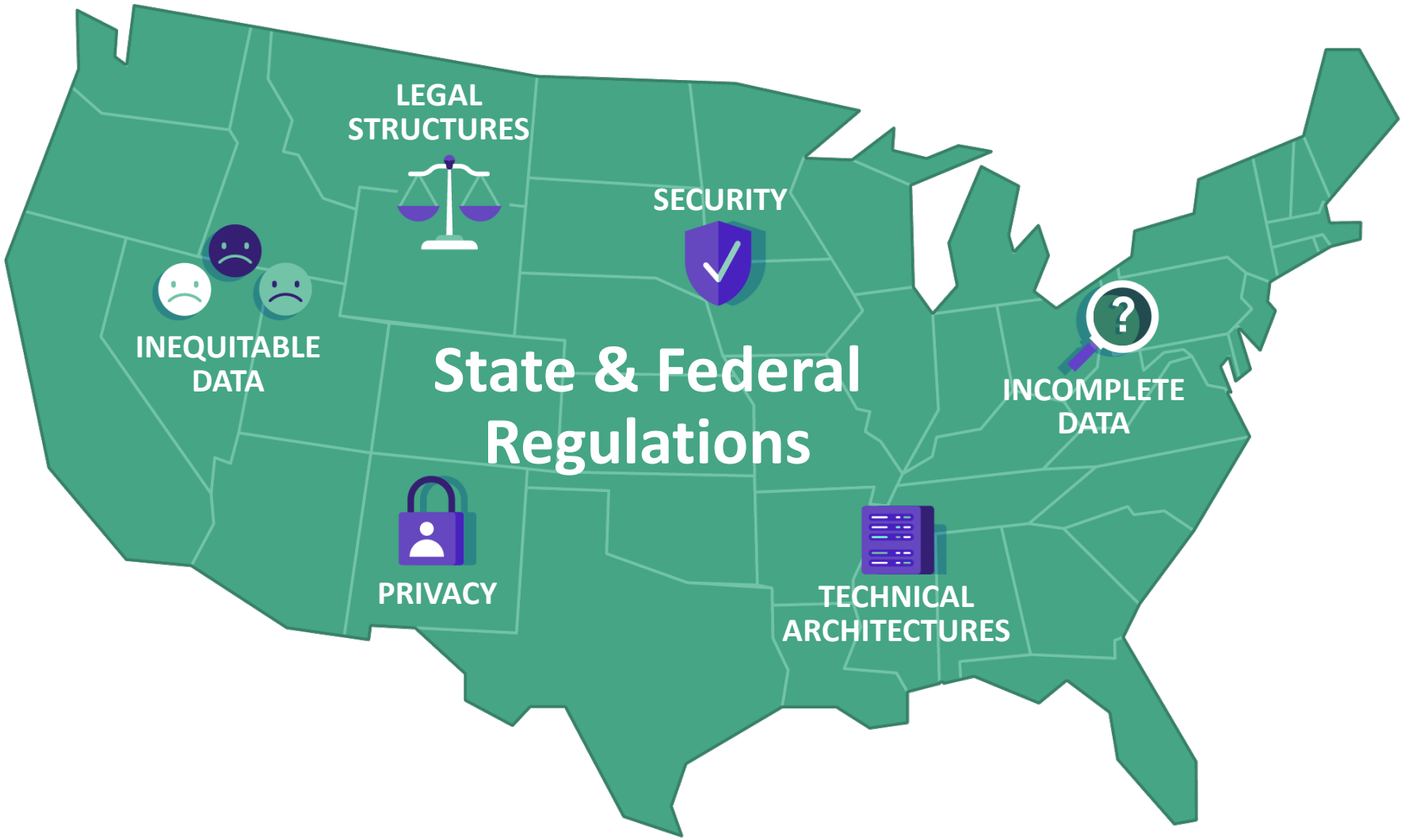
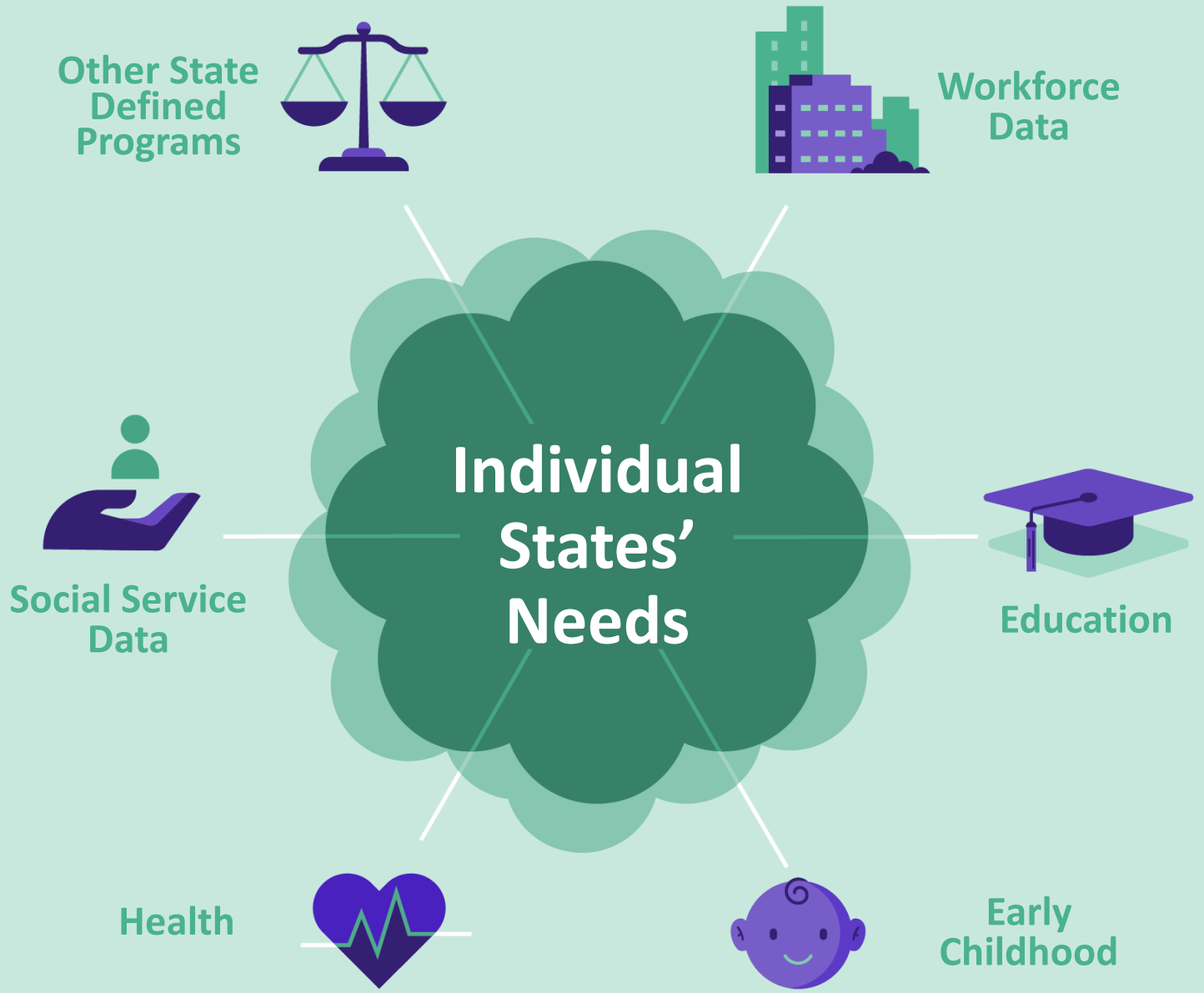
Data Integration Support Center

WestEd

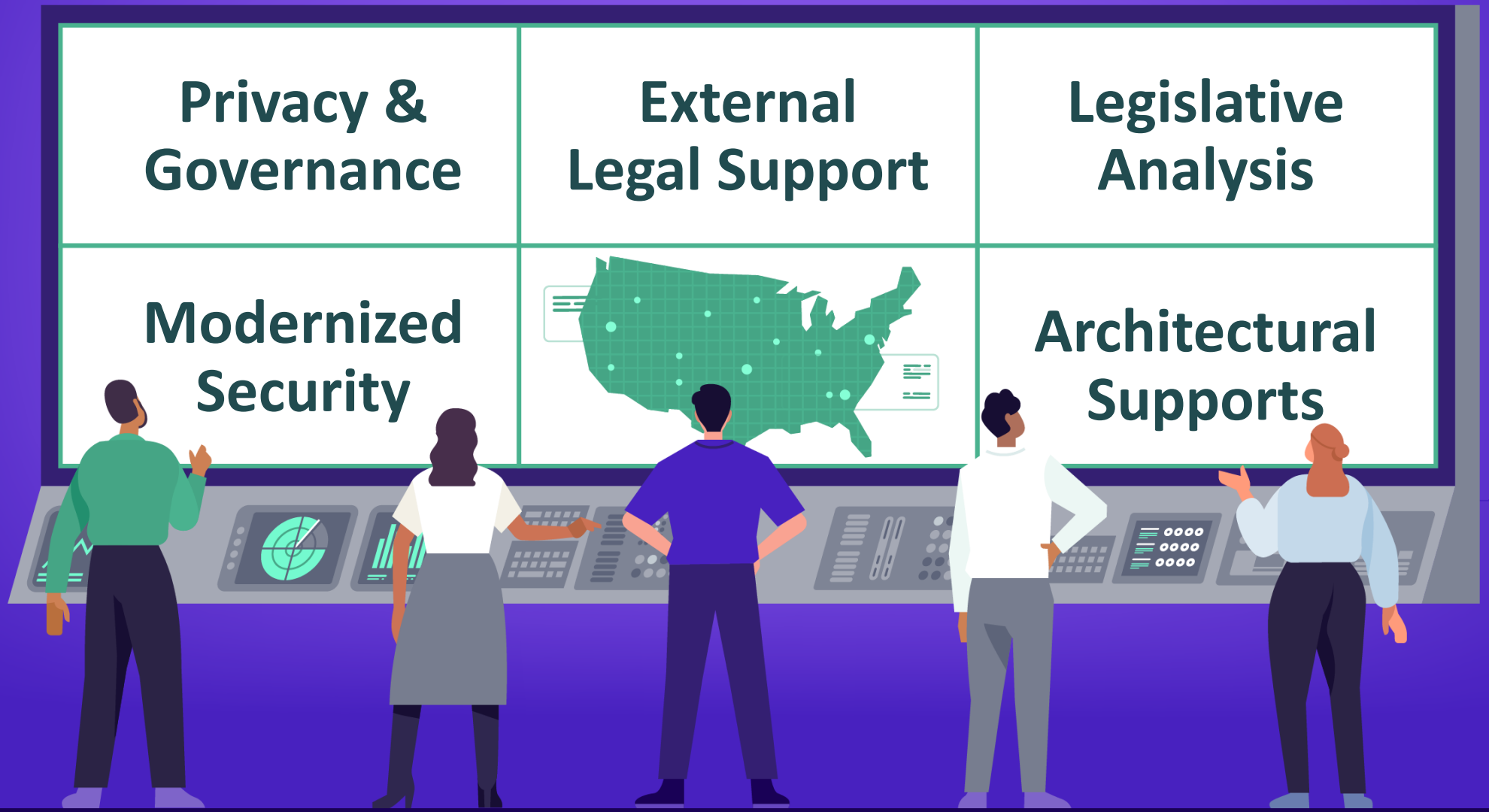
Public agencies have to navigate the complexities of state and federal privacy and security regulations alongside incomplete and inequitable data, burdensome legal structures, and outdated technical architectures.



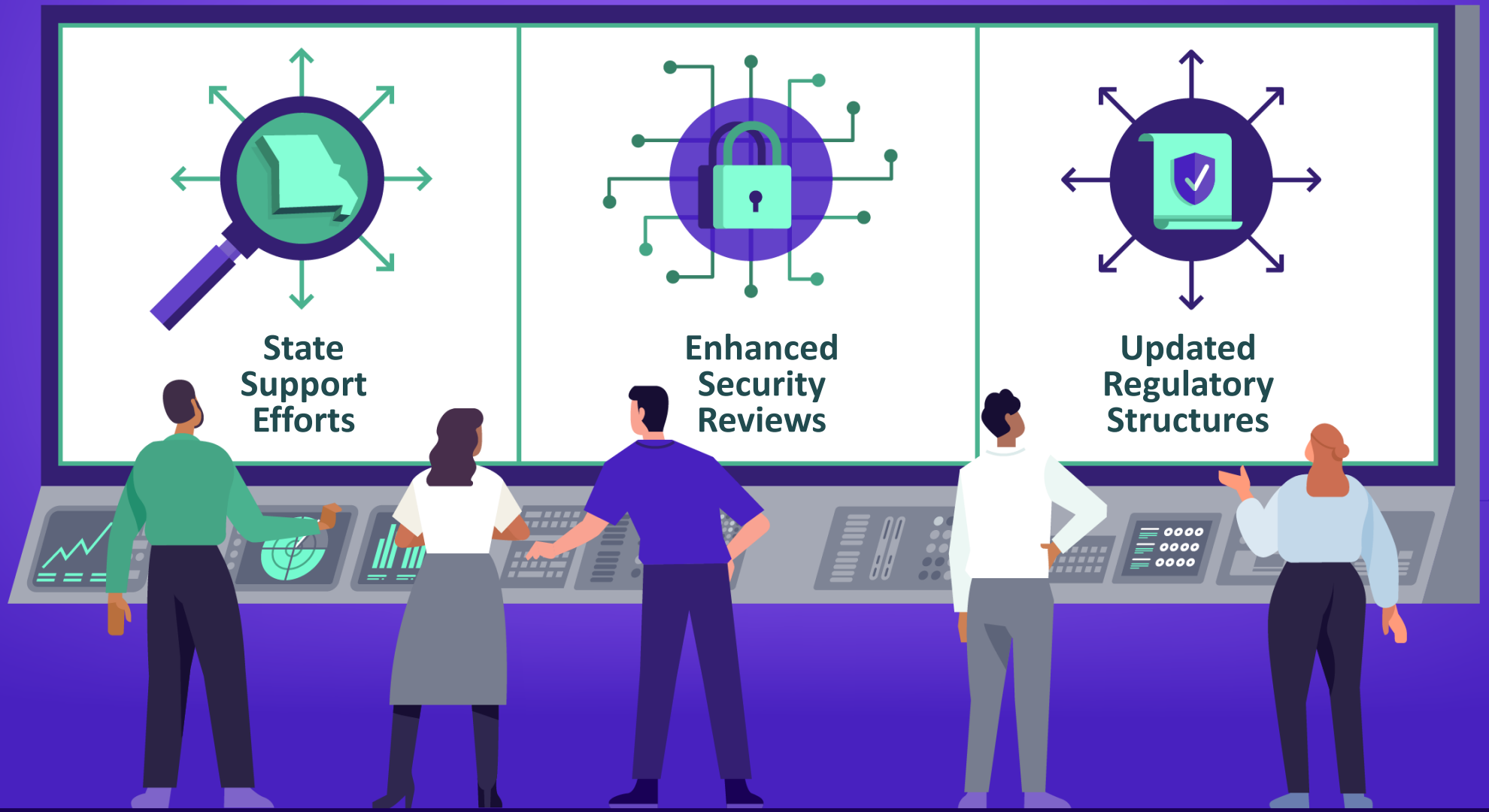
Integrating cross-sector data also requires legal expertise in cross-sector laws and understanding the nuances of individual states' needs.



Our holistic approach focuses on privacy and governance, external, and modernized security & architectural supports.

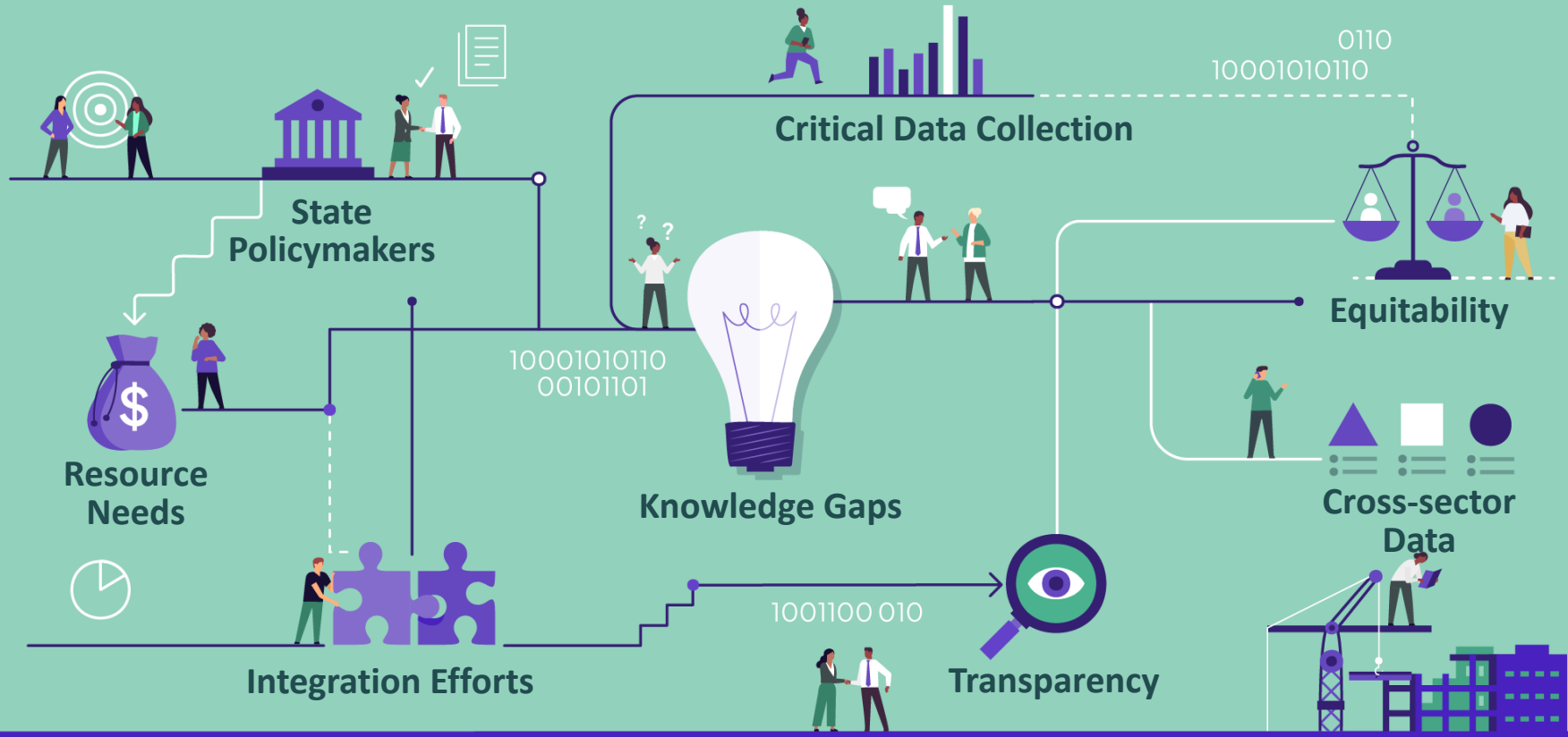


This helps us deliver support for state efforts, enhanced security reviews, and aiding partners in updating regulatory structures to provide a clear path to IDS success.



We understand that these complex and unique systems are built for state policymakers and their citizens.

Our thought partnership and expertise addresses knowledge gaps, resource needs, critical data collection and integration efforts, creating consistent and secure cross sector data that is transparent and equitable for all.



DISC Engagement Efforts

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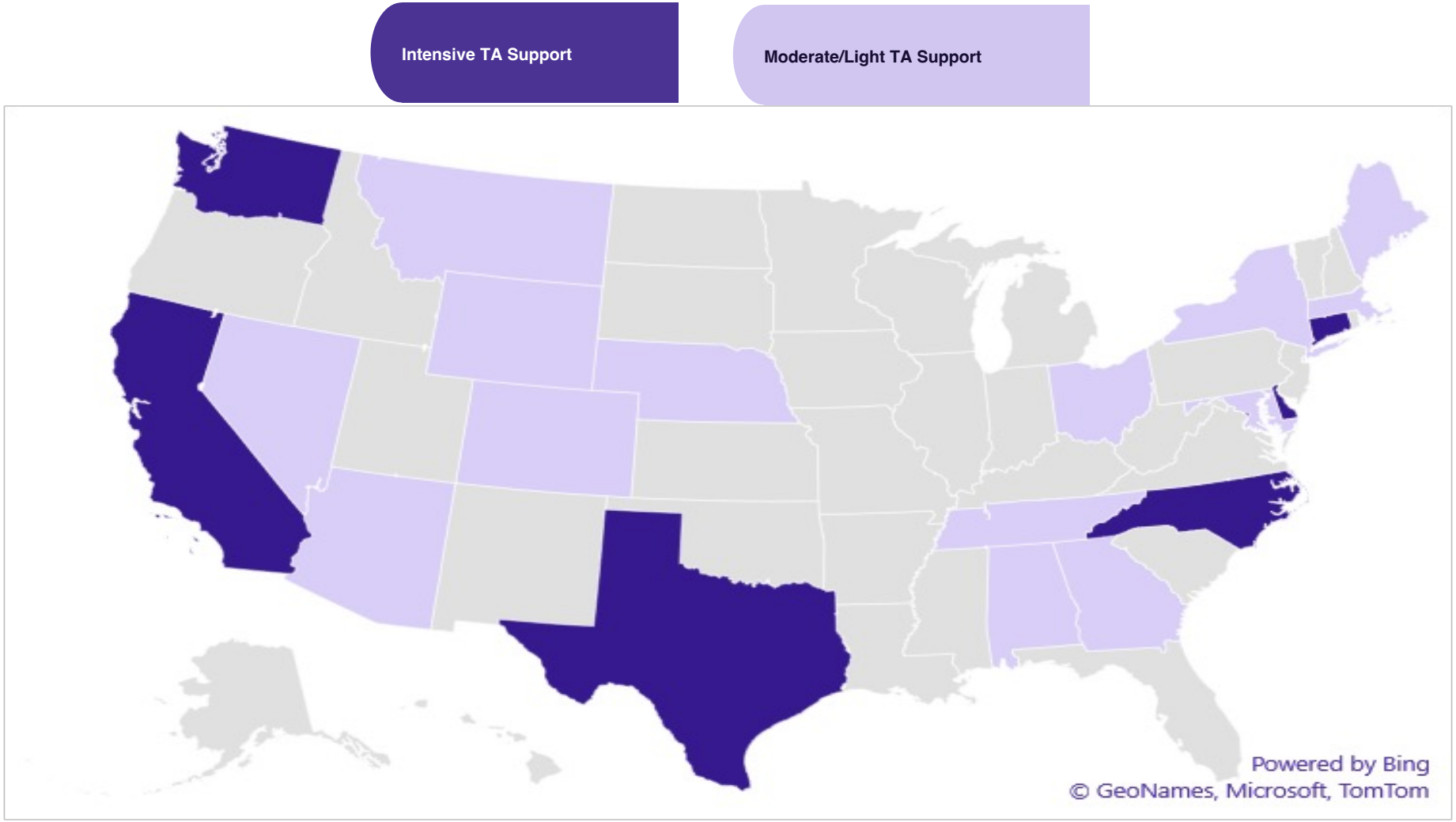
Data Integration Support Center
WestEd

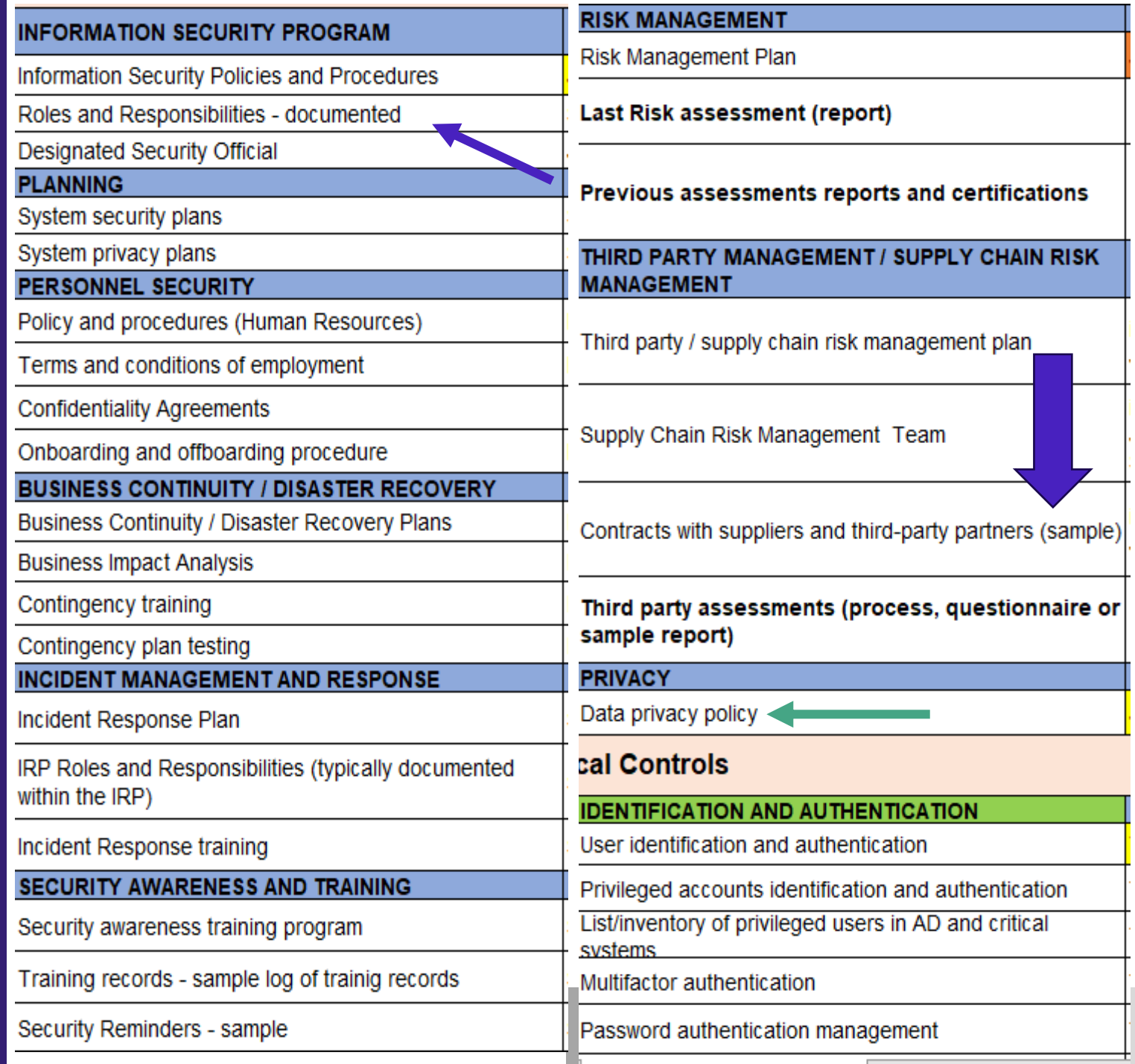


Engagement: Enhanced Security Review

Goes beyond traditional "external assessments" to compliment those findings with:

- **Disclosure avoidance policy/process review**
- **Legal/MOU agreement review**
- **3rd party contractual safeguards review**
- **Privacy review components include HIPAA, FSA, Workforce, HEA, & state regulatory requirements**

Enhanced Security Review Framework



INFORMATION SECURITY PROGRAM
Information Security Policies and Procedures
Roles and Responsibilities - documented
Designated Security Official
PLANNING
System security plans
System privacy plans
PERSONNEL SECURITY
Policy and procedures (Human Resources)
Terms and conditions of employment
Confidentiality Agreements
Onboarding and offboarding procedure
BUSINESS CONTINUITY / DISASTER RECOVERY
Business Continuity / Disaster Recovery Plans
Business Impact Analysis
Contingency training
Contingency plan testing
INCIDENT MANAGEMENT AND RESPONSE
Incident Response Plan
IRP Roles and Responsibilities (typically documented within the IRP)
Incident Response training
SECURITY AWARENESS AND TRAINING
Security awareness training program
Training records - sample log of trainig records
Security Reminders - sample

RISK MANAGEMENT
Risk Management Plan
Last Risk assessment (report)
Previous assessments reports and certifications
THIRD PARTY MANAGEMENT / SUPPLY CHAIN RISK MANAGEMENT
Third party / supply chain risk management plan
Supply Chain Risk Management Team
Contracts with suppliers and third-party partners (sample)
Third party assessments (process, questionnaire or sample report)
PRIVACY
Data privacy policy
cal Controls
IDENTIFICATION AND AUTHENTICATION
User identification and authentication
Privileged accounts identification and authentication
List/inventory of privileged users in AD and critical systems
Multifactor authentication
Password authentication management

Legislative Analysis

- Review of pending legislation for potential impact to data integration efforts
- Comment/testify to state policymakers on safeguards in place to protect security/privacy of data integration efforts
- Review alignment of data integration efforts within state and/or federal regulatory security & privacy structures

Regulatory Structures

DISC supports regulatory structures that encourage responsible data integration efforts that include appropriate technical, legal, and physical safeguards.

- **Confidentiality of Unemployment Insurance**
- **ESRA**
- **ESSA**
- **Various state regulation reviews**

DISC FERPA Myths Series

- FERPA and IDS Myths Debunked: Myth 1 – DISC debunks the myth FERPA prohibits education agencies from participating in integrated data systems.
- FERPA and IDS Myths Debunked: Myth 2 – DISC debunks the myth that there is noo benefit to workforce participation in an IDS and the combination of FERPA and workforce laws make it too complicated to try.
- FERPA and IDS Myths Debunked: Myth 3 – DISC debunks the myth that integrated data systems must be hosted by an education agency in order for education records to be shared under FERPA.

Legal Assistance

- DISC has legal resources available across a variety of sectors, including workforce, social services, education and other regulatory structures
- DISC partners with YOUR legal team to do some of the context specific heavy lift on unique, complex questions

DISC/AISP Attorney Training Series

This is an optional Subheader. Remove as needed.

DISC/AISP Attorney Training Series

- **Robust training series engaging virtual workshops from national experts and experienced practitioners that explore a major theme related to public sector data sharing.**
- **Access to a rich community of peers working to address legal challenges to sharing and integrating data.**
- **Some workshops will also offer the opportunity to apply for Continuing Legal Education (CLE) credit hours, at no cost to participants or their agencies, in certain states.**
- **Workshops are approximately 60 minutes.**
- **Space in each workshop is available for 30-40 participants**
- **To be notified when registration opens for workshops, join our email list here.**

Data Legal Training Course List

*Dates are tentative

Date*	Title	Primary Audience
Early March	A Lawyer's Role in Integrated Data System (IDS)	All
3/11/2024	Data 101 for Lawyers	Legal professionals
3/22/2024	**Federal Privacy Basics Part I: FERPA 101 & HIPAA 101**	ALL
4/8/2024	Policy Analysis for Lawyers	Legal professionals
4/22/2024	**Tech for Lawyers**	Legal professionals
5/6/2024	**Federal Privacy Basics Part II: Demystifying 42 CFR Part II, the Privacy Act, HMIS**	All
5/20/2024	Getting Started: Legal Frameworks for Data Sharing and Legal Analysis 101	Legal professionals
6/13/2024	Myth Busting: The Power & Promise of Data Sharing for School and Health Lawyers	Legal professionals
6/24/2024	Building a Table: Engaging Cross-agency Partners for Lawyers	Legal professionals
7/8/2024	How to Translate Lawyer for Technologists	Analysts & Technologists
7/29/2024	A Lawyer's Role for Analysts and Policymakers	Policy Makers

Artificial Intelligence Technical Assistance

AI Use Case Brief 1: Building a Secure AI Environment

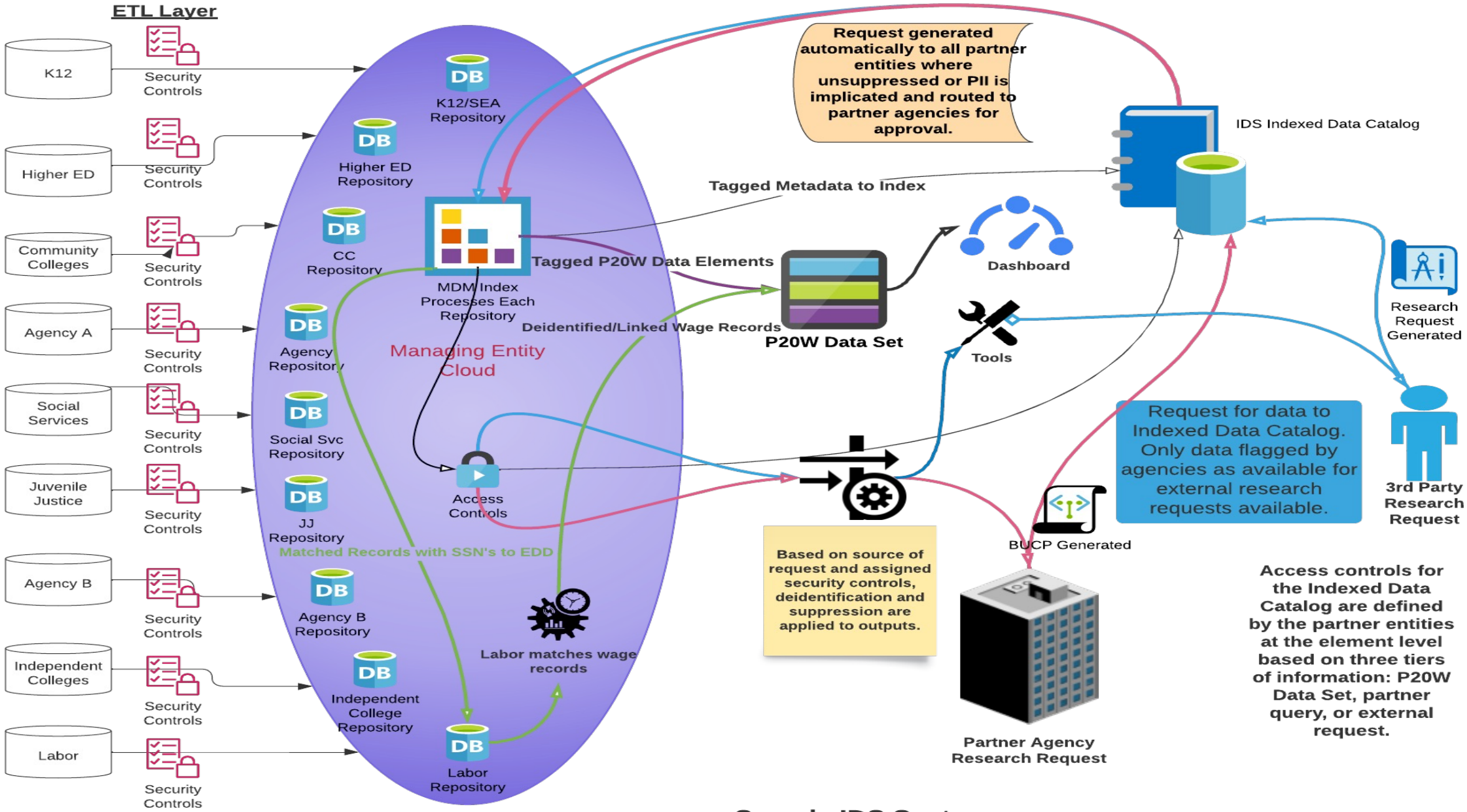
✓ **Target Completion Date: February-March 2024**

AI Use Case Brief 2: Utilizing Secure Generative AI Environment for Analyzing Assessment Items for Cultural Responsiveness

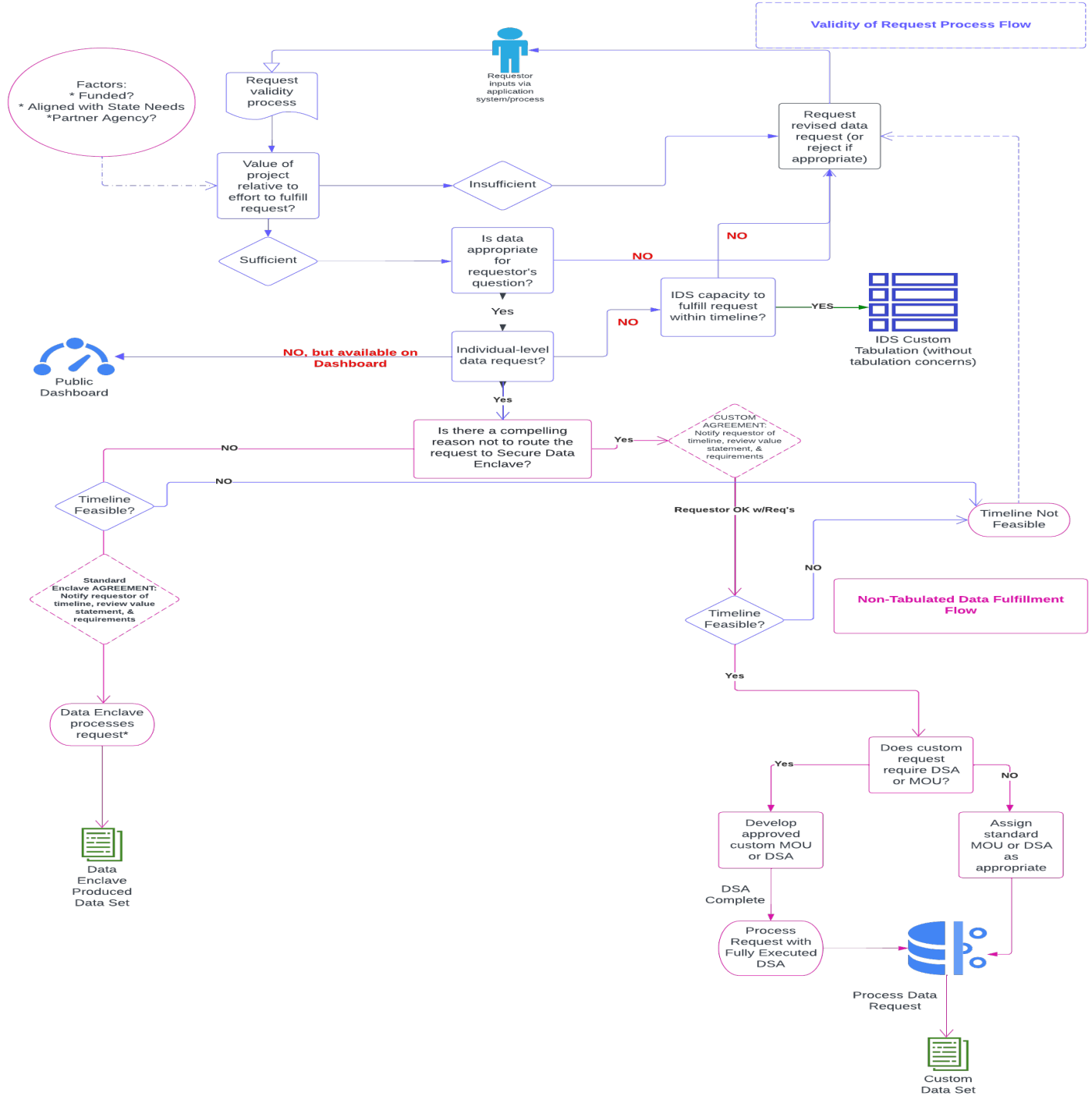
✓ **Target Completion Date: May 2024**

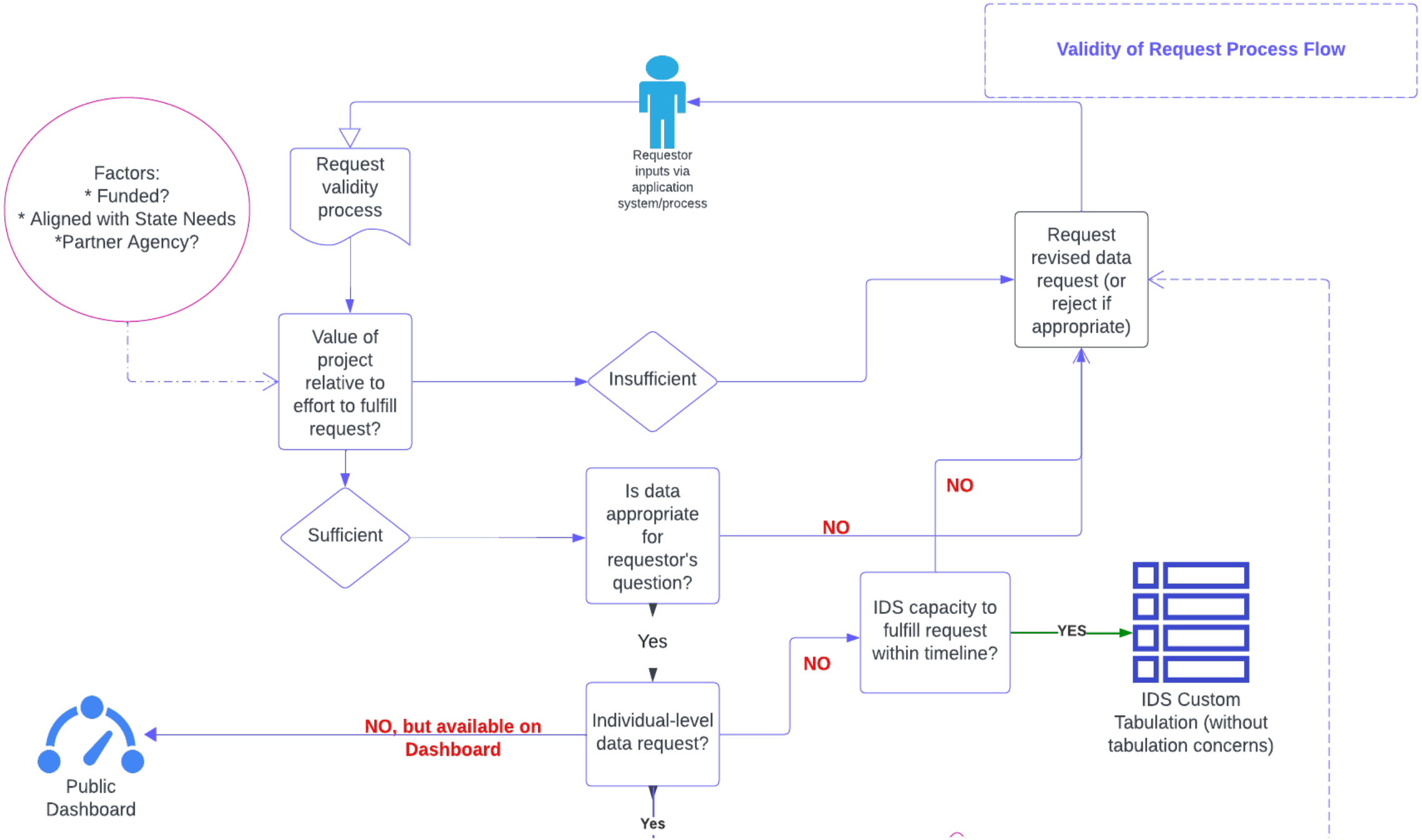
Intake Modernization: Template Flow

- **DISC works with public agency teams to design technical, legal, and security frameworks to leverage modern IDS solutions**
- **Technical & Legal Frameworks can be conducted in parallel if needed**
- **Use cases matter!**



Sample IDS System Intake & Request Processing Model


Validity of Request Process Flow
Requestor inputs via application system/process
Request validity process
Factors:
* Funded?
* Aligned with State Needs
*Partner Agency?
Value of project relative to effort to fulfill request?
Insufficient
Request revised data request (or reject if appropriate)
Sufficient
Is data appropriate for requestor's question?
NO
NO
Yes
IDS capacity to fulfill request within timeline?
YES
IDS Custom Tabulation (without tabulation concerns)
NO
Individual-level data request?
NO, but available on Dashboard
Public Dashboard
Yes
Is there a compelling reason not to route the request to Secure Data Enclave?
Yes
CUSTOM AGREEMENT: Notify requestor of timeline, review value statement, & requirements
NO
NO
Timeline Feasible?
Requestor OK w/Req's
Timeline Not Feasible
NO
Non-Tabulated Data Fulfillment Flow
Timeline Feasible?
Standard Enclave AGREEMENT: Notify requestor of timeline, review value statement, & requirements
Yes
Data Enclave processes request*
Does custom request require DSA or MOU?
Yes
NO
Develop approved custom MOU or DSA
Assign standard MOU or DSA as appropriate
DSA Complete
Process Request with Fully Executed DSA
Process Data Request
Data Enclave Produced Data Set
Custom Data Set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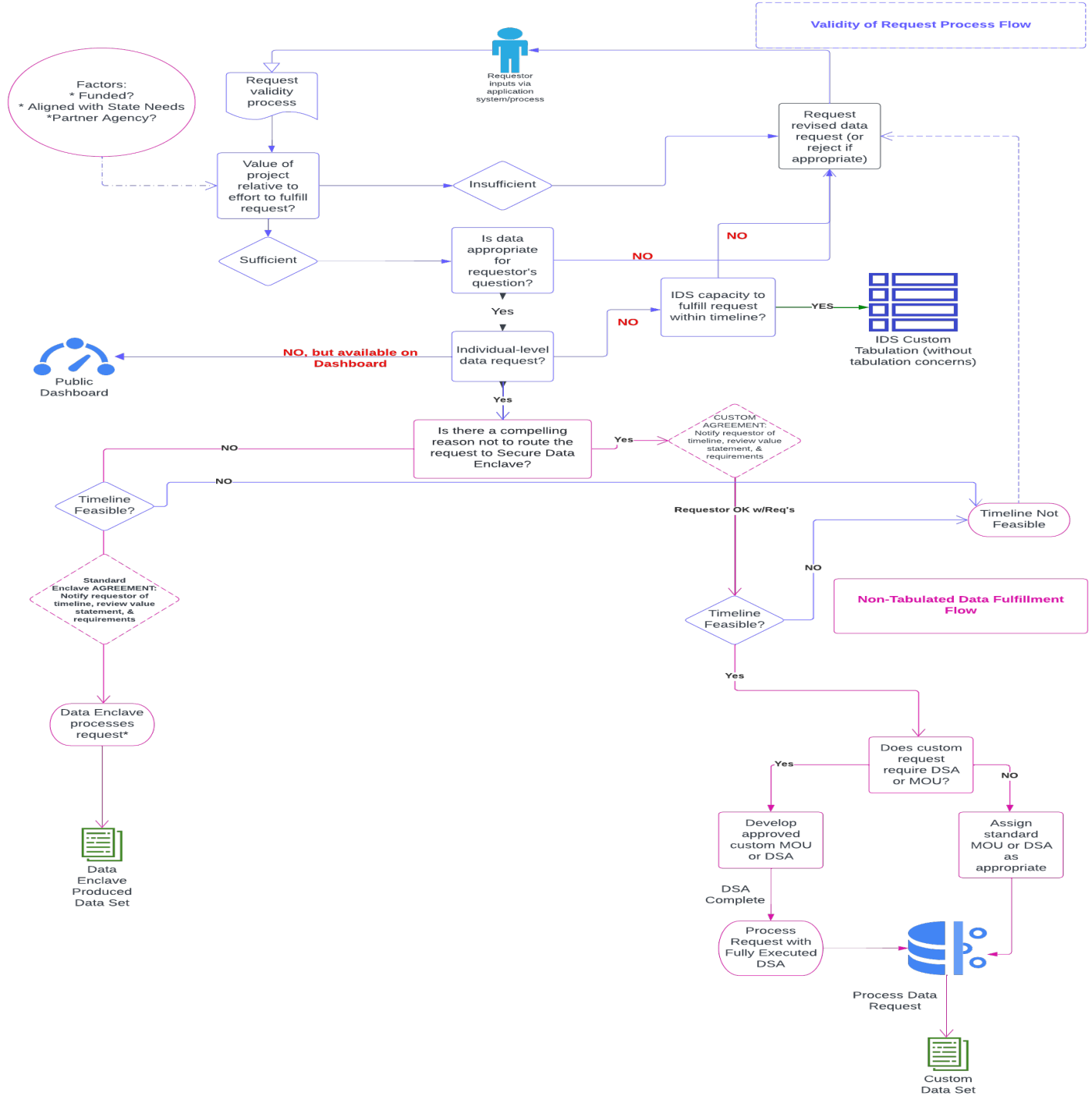
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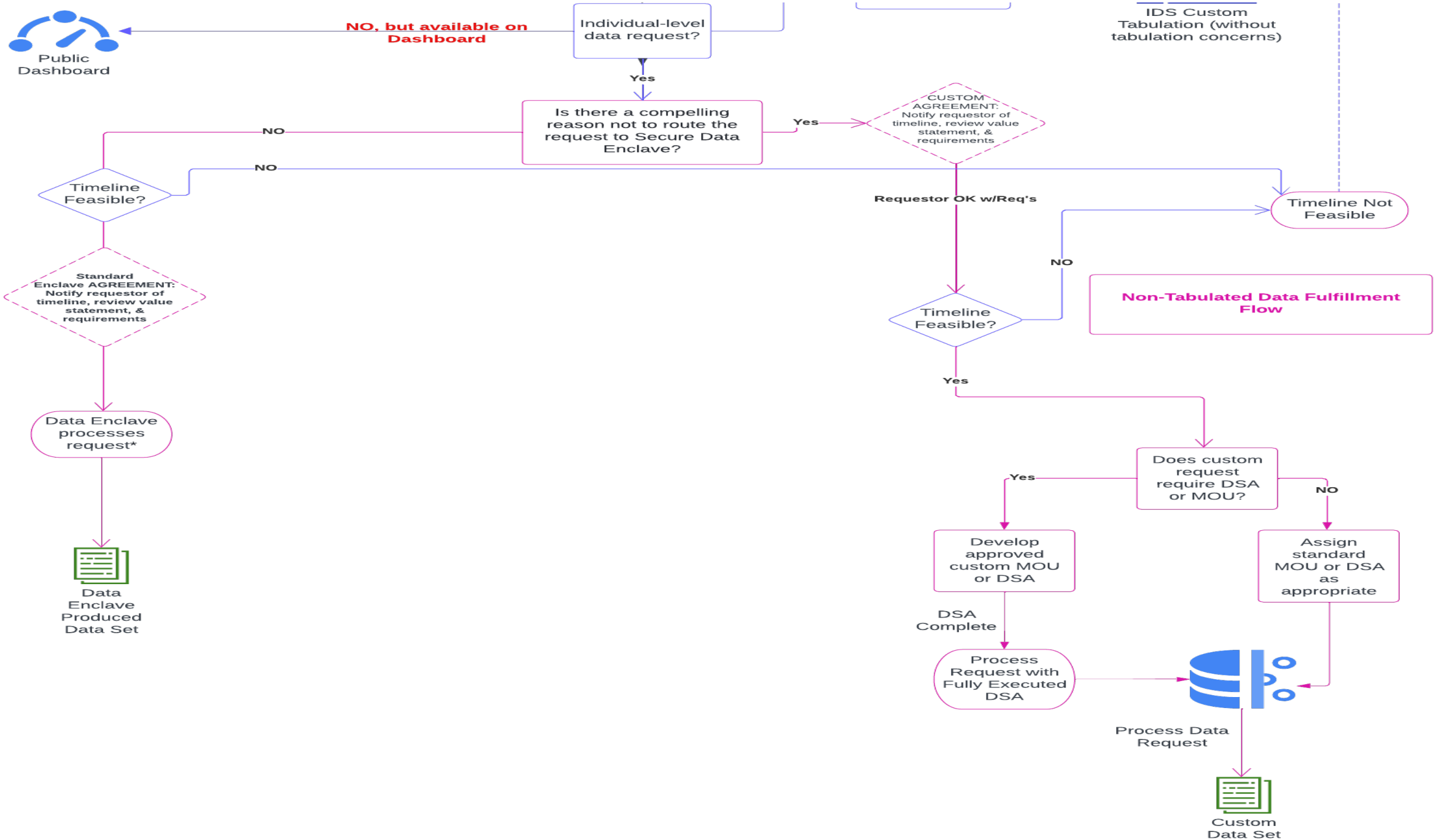
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Thank you.

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