PURPOSE

The Michigan Department of Health and Human Services (MDHHS) Data Governance Policy is to consistently create, define, manage, safeguard, and interpret data that is accessed, used, and shared across MDHHS according to the standards and policies agreed upon by the Data Governance steering committee. The overarching goal of this Data Governance Policy is to establish a framework for data governance management to facilitate effective and efficient data analysis across disparate organizational data systems. The needs of users of MDHHS data will be taken into consideration in the application of this Data Governance Policy. Nothing in this Data Governance Policy shall be construed to supersede any federal or state law or statute or to mandate data exchange in violation of any federal or state law or statute.

REVISION HISTORY

Issued: 06/19/2023
Next Review: TBD

DEFINITIONS:

Data Governance

A formal function within an enterprise tasked with aligning people, processes, and technology to administer and manage the organization's data and information assets in a manner that supports the overall business goals and objectives of the organization while aligning with industry standards of best practice with a specific focus on developing and implementing strategies, programs, and standards that promote data quality, integrity, accuracy, usability, reliability, security, consistency, compliance, and accountability across the organization.

MDHHS Data Governance Steering Committee

The managing authority for the MDHHS Data Governance implementation and oversight, which strategically and proactively addresses issues related to data and information management across MDHHS entities.

Responsible, Accountable, Consulted, and Informed (RACI)

A responsibility assignment matrix, also known as RACI Matrix or linear responsibility chart, which describes the participation by various roles in completing tasks or deliverables for a project or business process. RACI is an acronym derived from the four key responsibilities most typically used: Responsible, Accountable,

Consulted, and Informed, and it is used for clarifying and defining roles and responsibilities in cross-functional or organizational projects and processes.

MDHHS Data

Items of information that are collected, maintained, and utilized by MDHHS entities for the purpose of carrying out MDHHS business, even if subject to contractual or statutory limitations. MDHHS data may be stored either electronically or by paper and may take other forms including, but not limited to, text, graphics, images, sound, or video. MDHHS data are essential data required to conduct operations within the organization. This includes any data elements that are created, received, maintained, or transmitted.

POLICY

This Data Governance Policy:

- Establishes the MDHHS Data Governance Steering Committee to oversee the people, processes and information technology required to create consistent and proper handling of data and understanding of data and information across MDHHS.
- Establishes appropriate responsibility for the management of MDHHS's data as an asset and provides a directive to implement best practices with respect to inventorying, managing, and understanding the existence of MDHHS's assets to improve and encourage data sharing, and interpreting the data correctly and consistently.
- Promotes best practices in securing MDHHS's data against internal and external threats (such as, breach of privacy and confidentiality, protection from loss, or security breach), in concert with existing MDHHS Security Policies.
- Promotes quality and integrity of MDHHS data assets, resulting in greater accuracy, timeliness, reliability, interoperability, consistency, and fitness for use for decision making and achieving operational efficiency when applied in coordination with the Data Governance efforts within MDHHS Entities.
- Ensures that the Data Governance Policy is adhered to by every MDHHS employee, third-party vendor, volunteer, intern, and MDHHS contractor when working with MDHHS data.

- Ensures that the appropriate roles and responsibilities for Data Governance are consistently defined and applied across MDHHS Entities to encourage the accountability for data as an organizational data asset.
- Calls for the development of best practices for effective data management including establishing consistent data definitions, ensuring use of requirements-based data quality management practices, leveraging the role of data stewards, incorporating best practices for data traceability, lineage, audit trails, and controls, in support of compliance requirements.
- Employees, volunteers, interns, third-party vendors, and contractors who access, utilize, or manage data in any manner while executing business functions, activities, or services for or on behalf of MDHHS, its third-party vendors and contractors, shall be required to comply with this Data Governance Policy.

SCOPE

The scope of this Data Governance Policy applies to all employees, volunteers, interns, third-party vendors, and contractors within MDHHS who collect, access, utilize, or manage data in any manner while executing business functions, activities, or services for or on behalf of MDHHS Entities.

Applicability of this Data Governance Policy to third parties is governed by contractual agreements entered into between MDHHS Entities and the third party. For contracts in force as of the effective date, subject matter experts (SMEs) and the designated MDHHS Information Privacy and Security Officer acting under the guidance of the MDHHS Data Governance Executive Steering Committee should ascertain the applicability of this Data Governance Policy to third parties before seeking amendments. Prior to entering into new contracts, SMEs shall ascertain the applicability of this Data Governance Policy to third parties and include compliance requirements in the terms and conditions.

DATA GOVERNANCE POLICY PRINCIPLES

The purpose of Data Governance is to establish well-governed and managed data to ensure data quality and usability. The following outlines the principles that guide MDHHS Data Governance access and use, and these principles shall be adhered to by all MDHHS

Entities, or other MDHHS entity employees and third-party vendors and contractors:

- Data Governance defines the authority and accountability for making data-related decisions by a cross-functional governing body, and its authority applies to all levels of the organization (executive levels, business leaders, all employees, data stewards, information consumers, information caretakers, and those working on organizational initiatives and projects). The governing body, the MDHHS Data Governance Steering Committee, establishes, oversees, and continuously refines all aspects of the Data Governance framework, its roles, responsibilities, organization structure, guidelines, standards, processes, practices, tools, and related repositories and artifacts.

- Data will be defined, modeled, managed, and governed as a organization asset to minimize data redundancy and associated business costs and maximize its value as a strategic resource to MDHHS. New data introduced into the environment should be reviewed for alignment to architecture and standards, reuse, compliance, security, privacy, and regulatory requirements.

- Standard data definitions will be established for all core data elements, as determined by the MDHHS Data Governance Steering Committee, to include data used in critical decision-making and data shared/exchanged frequently with business partners.

- Data quality will be proactively defined, measured, and integrated into business processes, and solutions will be adopted to protect the organization and manage risks.

- An “extract once – use many” approach will be followed where data will be extracted, where feasible, from the strategic system of record as defined in the MDHHS data dictionary to help avoid one-off data silos.

- The level of data sharing/consolidation across business units/areas of the organization will be driven by business needs, but will be architected based on the organizational data model and data security policies. (for example, Master Data will be modeled and shared at the organizational level.)

- Data Governance supports all program area efforts to accomplish goals, including those defined in MDHHS' Strategic Plan, promoting multiple business benefits including ease of use and fit-for-use data in business intelligence and analytics. Sustained commitment of resources is required across the organization for the benefits to be realized.

- MDHHS data under governance will not be limited to a single data type or source. Data included in governance policies and practices will include the full inventory of organizational data, but not be limited to master and reference data, critical operational and transactional data, warehoused data, data marts, data from external sources, different types of data (traditional structured and unstructured data, metadata, text, and documents), systems of entry, systems of record, vendor-packages, and external data.

- Data will be safeguarded and secured, providing access based on business needs and in compliance to internal and external requirements, security, privacy, and other regulations.

POLICY AUTHORITY

In support and enforcement of the mission and purposes of the Data Governance Policy, the MDHHS Executive Oversight Group shall grant approval and support adoption of this Data Governance Policy throughout the organization. The MDHHS Data Governance Steering Committee shall establish a coordinated plan and framework for Data Governance to be implemented and maintained through policies, standards, and procedures as authorized by the MDHHS Executive Oversight Group.

While the MDHHS Data Governance Steering Committee is assigned a leadership role and oversight for this Data Governance Policy and activities herein, the functions of Data Governance will be shared among MDHHS executive and senior sponsors, data stewards, data administrators, and data users. Executive/senior sponsors will appoint strategic data stewards, and through the establishment of data policies and organizational priorities, provide direction to them and tactical data stewards, data administrators, and various data user groups.

ROLES AND RESPONSIBLITIES

All individuals within the scope of this Data Governance Policy are responsible for understanding and complying with all applicable MDHHS Data Governance policies, procedures, processes, and standards for accessing and utilizing MDHHS Data and its protection. Individuals responsible for Data Governance and data oversight within MDHHS Entities shall adhere to appropriate roles and responsibilities as defined in the MDHHS Data Governance Steering Committee Charter and the MDHHS Data Governance RACI Matrix.

REFERENCES

MDHHS Data Governance Steering Committee Charter

MDHHS Data Governance RACI (Responsible, Accountable, Consulted, Informed) Matrix

MDHHS Data Management and Data Governance Guiding Principles

DAMA Guide to the Data Management Body of Knowledge (DAMA-DMBOK2)

ENFORCEMENT

Violations of this policy or failure to implement provisions of this policy may result in disciplinary action up to and including termination, civil litigation, and/or criminal prosecution.

CONTACT

For additional information concerning this policy, contact the MDHHS Data Governance Steering Committee Chair at MDHHS-DataGovernance@michigan.gov.