1. AUTHORITY

To effectuate the mission and purposes of the Arizona Department of Administration (ADOA), the Agency shall establish a coordinated plan and program for information technology (IT) implemented and maintained through policies, standards and procedures as authorized by Arizona Revised Statutes (A.R.S.) § 18-104. This Policy shall not be construed to supersede any federal and state statutes or rules related to data governance.

2. PURPOSE

This Policy establishes governance over the interoperability of data exchanged between entities to reduce risk, maximize efficiency, increase the value of data exchanges and ensure that systems are developed and maintained in accordance with Statewide and Budget Unit (BU) strategic plans.

3. SCOPE AND APPLICABILITY

3.1 This policy applies to all employees and contractors within State Budget Units (BUs) who work with data or repositories of data while executing business functions, activities or services for or on behalf of BUs or their customers.

3.2 This policy applies to all Covered Information Systems designated as such by the Data Policy Council of the BU.

3.3 Applicability of this policy to third parties is governed by contractual agreements entered into between BUs and the third party. For contracts in force as of the effective date, subject matter experts (SMEs) acting under direction of the Data Policy Council, shall review the applicability of this policy to third parties before seeking amendments. Prior to entering into new contracts, SMEs shall ascertain the applicability of this policy to third parties and include compliance requirements in the terms and conditions.
3.4 With respect to all other Information Systems in service as of the Effective Date, implementation of this policy is recommended but is not mandatory. If such systems are already compliant as of the Effective Date then procedures to keep them compliant for the remainder of their lifetime shall be implemented or continued.

3.5 This policy shall be referenced in Business Requirements Documents, Requests for Proposal, Requests for Information, Statements of Work and other documents that specify the business and technical specifications of Information Systems being developed, procured or acquired.

3.6 State BUs and Third parties supplying information systems to other BUs or developing information systems on behalf of BUs shall be required to comply with this Policy including documentation to demonstrate compliance with all State policies and documented security controls.

3.7 This policy does not apply to document repositories such as file systems, file repositories, electronic documents, images or other files.

4. **EXCEPTIONS**

4.1 Policies, Standards and Procedures may be expanded or exceptions may be taken by following the Statewide Policy Exception Procedure.

5. **ROLES AND RESPONSIBILITIES**

5.1 The Director, Commissioner, Executive Director or other Chief Executive Officer of the BU (referred to herein as “Director”) shall be responsible for ensuring the effective implementation of Information Technology Policies, Standards, and Procedures (PSPs) within the BU.

5.2 BU Supervisors shall ensure that users are appropriately trained and educated on Data Governance policies and shall monitor employee activities to ensure compliance.

5.3 Individual Users shall adhere to all state and ADOA policies, standards and procedures pertaining to the use of the State IT resources.

5.4 The Data Policy Council, Data Management Committee, Data Owners, Data Custodians and Data Stewards shall be designated and shall carry out the duties assigned to them under P4400 – Data Governance Organization Policy.

5.5 The State Data Interoperability Council (SDIC) shall have the responsibilities designated in the Statewide Interagency Data Sharing Memorandum of Understanding (DSMOU).
6. POLICY

6.1 A Data Exchange is the transfer of data between 1) a Producer, who creates or produces the data and transmits it, and 2) a Consumer, who receives that data and consumes it. The Producer and Consumer can be an application, program, information system, agency, division, department, government or non-government entity.

6.2 Data interoperability is the degree to which data produced by an information system can be consumed by another information system without modification. A highly interoperable data exchange is one which:

6.2.1 Requires little or no modification or transformation of the data prior to consumption;

6.2.2 Is well documented to eliminate any ambiguity about what the data is, what it means or what can be used for;

6.2.3 Can be consumed by more than one consumer without requiring modifications or customization;

6.2.4 Has a clear business meaning to any consumer regardless of the purpose behind consuming the data.

6.3 Data Producers and Data Consumers are responsible for building and maintaining Interoperable Data Exchanges that are capable of producing or consuming data that complies with this Policy.

6.4 The SDIC, in conjunction with ADOA-ASET, shall maintain a shared library of Data Exchange Standards. BUs shall consult the library to learn of and implement existing data exchange standards rather than creating new Data Exchanges.

6.5 In the event that the specifications for an existing Data Exchange do not meet all the business needs of a new proposed exchange then the parties shall endeavor to define extensions to the existing exchange rather than creating a new one.

6.6 Data Consumers and Producers shall endeavor to perform any transformations of Data Exchanges between formats, such as flat text, delimited text, XML or JSON, that substantially have the same data content and elements, by a middleware application, rather than by building transformations into the application. The transformation application should be built in such a way that it can be re-used for similar Data Exchanges without the need to customize it to each application or Data Exchange.

6.7 If a BU does not have a middleware application then they should contact ADOA-ASET to subscribe to and use Arizona’s Enterprise Services Platform (AESP).
6.8 In the event that a Data Consumer consumes data that is substantially the same from multiple Data Producers then it shall define a standard for the Data Exchange that applies to all Data Producers and avoids writing custom programs to handle different specifications from different Producers.

6.9 Data Consumers and Data Producers shall ensure that Data Exchanges are fully documented in a Data Sharing Agreement (DSA). The DSA shall convey the purpose of the exchange, terms of use and non-disclosure of confidential information, the Privacy and Risk classification of the data, the data elements, data accuracy, data precision, data timeliness, service level expectations, data provenance and security requirements. Since BUs may administer multiple funds and programs, including Federal programs, a DSA is required regardless of whether the exchange is internal or external to the BU.

6.10 The terms of use of exchanged data shall include explicit disclosures including but not limited to accuracy, currency, source depending on the classification of the data and the identity of the Producer and Consumer.

6.11 Confidential Information

6.11.1 Entities that receive data from other BUs are responsible for knowing and complying with security measures applicable to the assigned classification, for informing the owner if full compliance cannot be achieved, and, in accordance with P8240 – Incident Response Planning Policy, of any compromise or possible compromise of Confidential information.

6.11.2 Unless appropriate measures to secure physical media are explicitly defined and agreed to in the Data Sharing Agreement, all data exchanges shall be executed electronically. Data transmitted electronically shall conform to all Statewide Data Security Policies.

7. DEFINITIONS AND ABBREVIATIONS

7.1 The data repository of a Covered Information System is considered a Covered Database for the purposes of this Policy.

7.2 Refer to the PSP Glossary of Terms located on the ADOA-ASET website.

8. REFERENCES

8.1 P1000, Information Technology Policy
8.2 A.R.S. § 18-104
8.3 P4400 – Data Governance Organization Policy
8.4 P8000 - IT Security Policy

9. ATTACHMENTS

None.

10. REVISION HISTORY

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This Statewide Policy is hereby approved with an effective date of January 2, 2019.

Morgan Reed (Jan 2, 2019)

Morgan Reed  
State CIO
"P4440 Data Governance Data Interoperability Policy" History

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