



Mapping Data Flows — Checklist

This Privacy Technical Assistance Center (PTAC) guidance is intended to help educational agencies and institutions create a visual “map” of data flows for their data. Including these maps in data governance plans can help organizations to better understand what data are in their systems, where the data reside, what sources the data come from, why the data are

collected, what limitations or restrictions apply, how they are linked, and what policy questions the data are used to answer. While it is not mandatory to create these visuals, PTAC recommends them as a best practice when confronted with complex data scenarios. For additional resources on this and other data privacy- and security-related topics, please visit <http://ptac.ed.gov>.

STEPS



Identify the key policy questions you are trying to answer with your data.

- Verify that the questions align with the district, gubernatorial, legislative, and executive leadership’s goals to ensure political support.
- Identify applicable laws (federal, state, and/or local) that affect data use and sharing to ensure compliance.



Determine what data types and elements are needed to answer the identified policy questions.

- Inventory systems to determine where the required data elements reside.
- Determine the level of data needed to answer the policy questions (e.g., aggregate, de-identified, personally identifiable information, etc.).
- Involve partner agencies early in the process.



Examine security and privacy policies in EACH agency.

- Check applicable laws and policies for each agency to ensure the identified elements can be both accessed and used to answer the policy questions.
- Ensure policies governing linked data comply with all agencies’ laws and governance needs.



Establish a multi-agency [data governance program](#).

- Include multi-agency data stewardship and include data stewards representing each agency.
- Ensure the program encompasses all data sets, actors, and policy questions for the full data life cycle.
- Document the data governance process.

WHY MAP DATA FLOW?

Understanding data flows, sources, and elements in your system helps to determine which laws apply to which types of elements:

- ✓ Privacy Protections
- ✓ Security Requirements
- ✓ Breach Notification Requirements
- ✓ Consent Requirements

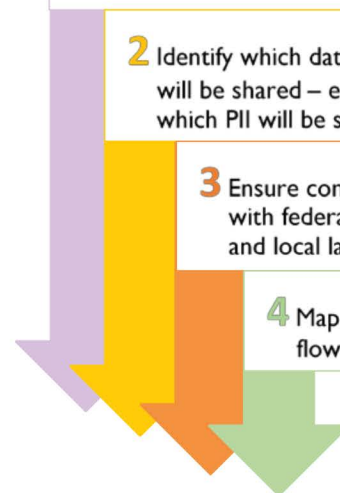
Mapping also helps you understand the data and communicate about data-related issues more effectively, both internally and externally.

1 Involve many agencies, early in the conversation.

2 Identify which data types will be shared – especially which PII will be shared.

3 Ensure compliance with federal, state, and local laws.

4 Map the data flow visually.



STEPS CONTINUED



Map the data flow in a visual format.

- Map the data sources, paths, linkages, uses, and agencies' desired outcomes for each policy question.
- Examine the map for holes in data links and protections, and for potential issues around data ownership, accountability, and collection.
- Ensure the map contains sufficient detail so that it can be used to review and approve new requests for access or use of linked data.



Verify that the necessary data sharing agreements are in place.

- Look at data flows and agencies involved to determine whether a FERPA exception applies (e.g., FERPA doesn't apply to properly de-identified data).
- Check relevant definitions and criteria for data sharing to ensure legal compliance (e.g., definitions of "Education Program" and "Authorized Representative" under FERPA).
- If a written agreement is needed, make sure it is in place and includes all FERPA, state, and local required components.



Mapping Best Practices

- ❑ A good map covers both the issues relating to setting up a data sharing arrangement AND the ongoing use of that arrangement.
- ❑ Remember, FERPA compliance represents a *minimum* bar, and your state may have additional legal requirements.



SAMPLE MAP

