Data Systems Change Policy Development Packet

State Part C and Part B 619 programs will encounter the need for changes in their data system(s). Many changes to an existing data system can affect work conducted at the state, local/district, and/or provider levels. Therefore, while Part C and Part B 619 staff may not be directly involved in the technical changes made to data systems that directly affect their work, the state should establish a process for Part C and Part B 619 program staff to be actively involved in partnering with IT staff when considering data system changes that will affect their data and work. Please see the DaSy Data Governance and Management Toolkit for more information on Data Systems Change Policies and other data governance policies.

How to Use This Packet

1. Review and Complete the Considerations Worksheet for Data *Systems Change* Policy

The considerations include questions about general policy implementation and the procedures associated with work covered by this policy. A team knowledgeable about this content and the procedures should convene to discuss these considerations. The team assembled should, include but not necessarily be limited to relevant and knowledgeable Part C or Part B 619 staff. (Others might include, IT, broader data governance committee members, etc.)

Each lettered consideration in this worksheet references a corresponding number in the Data Systems Change Policy Template. Consideration-specific notes should be captured on this worksheet and be used to refine the applicable section of the Data Systems Change Policy Template. After reflection and discussion by the team, a Part C or Part B 619 program may opt to exclude consideration content in their final policy.

1. Use Responses to the Considerations to Complete the Data *Systems Change* Policy Template

The Data Systems Change Policy Template is a fully modifiable document so that the resulting policy can be adapted to align with other states policies. Where appropriate, some basic content is included in the template; however, the content can and should be edited, added to, or deleted so the resulting policy accurately reflects the Part C or Part B data governance in this area. It may also be helpful to add links to policies referenced within the template.

The Data Systems Change Policy Template has 12 sections and there are one or more considerations that relate to each section. Sections vary in their depth and complexity, but all are important to fully describe the policy and the data governance and procedures covered by the policy. Each numbered section in this template references a corresponding letter in the Considerations Worksheet for Data Systems Change Policy. Once the policy is completed, there is no need to keep the lettered cross references to the associated considerations.

If you have questions about or would like assistance with this work, please contact: DaSy‑Center@sri.com

Considerations Worksheet for Data Systems Change Policy

| Considerations Worksheet for Data Systems Change Policy  |
| --- |
| *Considerations* | *Template Section* | *Notes/Status* | *Draft Language* |
| 1. Which, if any, federal laws/regulations (IDEA and FERPA) related to data systems change apply to the Part C or Part B 619 program?
 | 1.1 | *See policy template for draft language.* |  |
| 1. What, if any, additional state agency policies related to data systems change apply to the Part C or Part B 619 program?
 | 1.2 |  |  |
| 1. What specific Part C or Part B 619 policies or procedures, if any, exist and apply data systems change?
 | 1.3 |  |  |
| 1. When did/does this policy take effect?
 | 2 |  |  |
| 1. Which Part C or Part B 619 role should be contacted for more information on this policy?
 | 3 |  |  |
| 1. How frequently will this policy be reviewed and, if needed, updated?
 | 4.1 |  |  |
| 1. What mechanisms will be used to collect user and other stakeholder input for consideration in the review and possible revisions to this policy?
 | 4.2 |  |  |
| 1. Where can the public access this policy?
 | 5.1 |  |  |
| 1. How will interested members of the public be informed of this policy?
 | 5.2 |  |  |
| 1. What parties (including participating agencies) will be required to follow this policy?
 | 6 |  |  |
| 1. What is the purpose of the Data System Change Policy?
 | 7 | *See policy template for draft language.* |  |
| 1. What is the definition of data system change?
 | 8 | *See policy template for draft language.* |  |
| 1. What data systems and data reported from these systems are covered by this Data System Change Policy?
 | 9 |  |  |
| 1. Which role is responsible for establishing and managing policies and procedures related to this policy?
 | 10.1 |  |  |
| 1. Which role is responsible for monitoring adherence to this policy?
 | 10.2 |  |  |
| 1. Which role is responsible for addressing questions regarding this policy?
 | 10.3 |  |  |
| 1. Which role is responsible for securing or providing training and technical assistance on data system change?
 | 10.4 |  |  |
| 1. Which role is responsible for addressing failures to adhere to this policy?
 | 10.5 |  |  |
| 1. Which role is responsible for receiving reports of violations of this policy within the agency?
 | 10.6 |  |  |
| 1. Which role is responsible for informing stakeholders about the process for requesting a data system change?
 | 11.1.1 |  |  |
| 1. Which role is responsible for making publicly available a process for stakeholders to submit a request for a data system change?
 | 11.1.2 |  |  |
| 1. Which roles are responsible for completing *Data System Change Request Form*?
 | 11.1.3 | *Internal and external stakeholders* |  |
| 1. Which role is responsible for submitting *Data System Change Request Form* to the designated recipient?
 | 11.1.4 |  |  |
| 1. Which role is responsible for acknowledging *Data System Change Request Form* receipt?
 | 11.1.5 |  |  |
| 1. Which role is responsible for establishing a team to evaluate data system change requests?
 | 11.2.1 |  |  |
| 1. Which role is responsible for reviewing each request for completeness, need for more information, and change impact?
 | 11.2.2 |  |  |
| 1. Which role is responsible for reviewing and assigning acceptable requested changes determined to have no impact?
 | 11.2.3 |  |  |
| 1. Which role is responsible for collecting additional information about requests if needed?
 | 11.2.4 |  |  |
| 1. Which role is responsible for approving/ conditionally approving/ rejecting change requests based on tea evaluation and consideration?
 | 11.2.5 |  |  |
| 1. Which role is responsible for communicating the decision of the evaluation team to the requester?
 | 11.2.6 |  |  |
| 1. Which role is responsible for establishing a process and plan for implementing an approved data system change?
 | 11.3.1 |  |  |
| 1. Which roles are responsible for developing a plan and schedule for large, approved changes?
 | 11.3.2 |  |  |
| 1. Which role is responsible for overseeing the overall design, development, and testing of the data system changes?
 | 11.4.1 |  |  |
| 1. Which role is responsible for developing support documentation as required to reflect the approved data system change?
 | 11.4.2 |  |  |
| 1. Which role is responsible for distributing change details to all relevant parties through established communication processes?
 | 11.4.3 |  |  |
| 1. Which role is responsible for confirming that all data system changes, documentation, communication, and training are complete and close the system change request?
 | 11.4.4 |  |  |
| 1. Which role is responsible for trainings to support data systems change?
 | 12.1 |  |  |
| 1. Which role is responsible for documentation to support data systems change?
 | 12.2 |  |  |
| 1. Which role is responsible for collecting user input to support data systems change?
 | 12.3 |  |  |

Data Systems Change Policy Template for
NAME OF PART C/PART B 619 PROGRAM

1. Requirements
	1. NAME OF STATE is federally required to collect and report PART C OR PART B 619 data and collects such data through data systems noted below in section 9, Policy Application. Ramifications of any proposed change to those data systems must be thoughtfully considered by weighing the local and state effort, impact and cost of the proposed change against the state and local benefits of the proposed change while following established requirements for data system changes. (a)
	2. The state requirements (statutes/regulations/rules/policies) that apply to data system change are: (b)

*(insert relevant state requirement)*

*(insert relevant state requirement)*

* 1. The PART C OR PART B 619 policies or procedures that apply to data system change are: (c)

*(insert relevant Part C or Part B 619 policy/procedure)*

*(insert relevant Part C or Part B 619 policy/procedure)*

1. Effective Policy Date

*(insert date)* (d)

1. Point of Contact

*(insert Part C or Part B 619 role or other contact as applicable)* (e)

1. Revisions

4.1 The Data Systems Change Policy will be reviewed and updated as needed/or *(insert frequency).* (f)

4.2 PART C OR PART B 619 will collect users and other stakeholders’ input through the following mechanisms to review and revise data systems change policies and procedures. *(insert mechanisms)* (g)

4.3 Below is a listing of all policy revisions completed to date: *(insert version number, date, and associated notes)*

1. Access

5.1 The Data Systems Change Policy will be available to the public at *(insert URL).* (h)

5.2 Interested members of the public will be informed by *(insert mechanisms).* (i)

1. Relevant Parties

This policy applies to *(insert name of programs and/or agencies)* and the IT, vendors, content, and data staff overseeing and managing the PART C OR PART B 619 data. Additionally, external stakeholders requesting changes to a PART C OR PART B 619 data system are also active associates to this policy. (j)

1. Purpose

The purpose of this Data System Change Policy is to establish authority and procedures for considering any requests to change any PART C/PART B 619 PROGRAM NAME data system(s) and managing any approved changes. (k)

1. Definition

A *data system change* is any change to an existing data system including, but not limited to data items, response options, business rules/logic, system functions, automated system analysis of data, system generated reports, user interface, support documentation, technology, etc. (l)

1. Policy Application

The following PART C/PART B 619 PROGRAM NAME data systems are covered by this Data Systems Change Policy. (m)

| Data System | Description |
| --- | --- |
| *(data system name)* | *(description)* |
| *(data system name)* | *(description)* |
| *(data system name)* | *(description)* |
| *(insert data systems as needed)* | *(description)* |

1. Responsibilities

The table below outlines the specific responsibilities and roles related to data systems change.

| Responsibilities | Data System | Role Responsible (by data system) |
| --- | --- | --- |
| 10.1 Establish and manage procedures related to this policy. (n) | *(data system name)**(data system name)* | *(role responsible)**(role responsible)* |
| 10.2 Monitor adherence to this policy. (o) | *(data system name)**(data system name)* | *(role responsible)**(role responsible)* |
| 10.3 Address questions regarding this policy. (p) | *(data system name)**(data system name)* | *(role responsible)**(role responsible)* |
| 10.4 Secure or provide training and technical assistance on data requests. (q) | *(data system name)**(data system name)* | *(role responsible)**(role responsible)* |
| 10.5 Address failures to adhere to this policy. (r) | *(data system name)**(data system name)* | *(role responsible)**(role responsible)* |
| 10.6 Receive reports of violations of this policy within the agency. (s) | *(data system name)**(data system name)* | *(role responsible)**(role responsible)* |
| *(insert other responsibilities as needed)* | *(data system name)**(data system name)* | *(role responsible)**(role responsible)* |

1. Procedures

The table below includes the procedures used to support this Data Systems Change Policy.

| Procedure | Role Responsible |
| --- | --- |
| 1. Initiation of Request
 |  |
| 1. Inform stakeholders of each Part C/Part B 619 data system about the process for requesting a data system change (t)
 | *(role responsible)**(role responsible)* |
| 1. Make publicly available a process for stakeholders to submit requests for changing a Part C/Part B 619 data system. (Draft forms to support data systems change are noted throughout this section and linked in section 12.Or describe an alternative data system change request process.) (u)
 | *(role responsible)**(role responsible)* |
| 1. Complete *Data System Change Request Form*. (v)
 | *Internal or external stakeholder* |
| 1. Submit *Data System Change Request Form* to designated recipient. (w)
 | *(role responsible)**(role responsible)* |
| 1. Acknowledge *Data System Change Request Form* receipt by EMAIL OR OTHER WRITTEN MEDIUM within TIME PERIOD. Written acknowledgement shall include when a decision about the requested change will be made, when requester can expect to be informed of that decision, and a request for additional information (if needed). (x)
 | *(role responsible)**(role responsible)* |
| 1. Evaluation of Request
 |  |
| 1. Establish a team to evaluate data system change requests. Team shall consist of those responsible for funding, overseeing, supporting the Part C/Part B 619 data system and with content knowledge to review requests for completeness and feasibility. (y)
 | *(role responsible)**(role responsible)* |
| 1. Review each request for completeness, need for more information, and change impact (e.g., stakeholder impact, costs, time to implement, training, benefits, redundancy).(z)
 | *(role responsible)**(role responsible)* |
| 1. Review and assign acceptable requested changes determined to have no impact (e.g., spelling errors, page layout, minor corrections/updates). (aa)
 | *(role responsible)**(role responsible)* |
| 1. Collect additional information about requests if needed (e.g., internal direction from administration, more context, technical and local implications, cost-benefits, vendor input.). (See *Data System Change Request Review Form*.) (bb)
 | *(role responsible)**(role responsible)* |
| 1. Approve/conditionally approve/reject change request based on team evaluation and consideration. (See *Data System Change Request Decision Form*.) (cc)
 | *(role responsible)**(role responsible)* |
| 1. Communicate the decision of the evaluation team to the requester in writing within TIME PERIOD. If the data system change request was accepted provide the expected time for implementing the change. If not accepted, provide a brief explanation why the request was denied, tabled, or delayed. All affected parties shall be informed. (dd)
 | *(role responsible)**(role responsible)* |
| 1. Planning for Change
 |  |
| 11.3.1 Establish a process and plan for implementing an approved data system change. (*See Data System Change Request Decision Form.)* Process shall be commensurate with the magnitude of the approved change and Part C/Part B 619 shall have an active role in relevant changes. (ee) | *(role responsible)**(role responsible)* |
| 11.3.2 Develop a plan and schedule for large, approved changes with input from PART C/PART B 619 PROGRAM STAFF WITH SYSTEM AND/OR CONTENT KNOWLEDGE. Large plans may include stakeholder input, a detailed plan, project manager, schedule, budget, and communication plan for informing stakeholders of system changes. (ff) | *(role responsible)**(role responsible)* |
| 1. Implementation, Management, Confirmation and Communication
 |  |
| 11.4.1 Oversee the overall design, development, and testing of the data system changes until changes meet all expectations. (gg) | *(role responsible)**(role responsible)* |
| 11.4.2 Develop support documentation as required to reflect the approved data system change. (hh) | *(role responsible)**(role responsible)* |
| 11.4.3 Distribute change details to all relevant parties through established communication processes (list processes). (ii) | *(role responsible)**(role responsible)* |
| 11.4.4 Confirm that all data system changes, documentation, communication, and training are complete and close the system change request. (jj) | *(role responsible)**(role responsible)* |
| *(insert additional procedures as needed)* | *(role responsible)* |

1. Responsibilities for Supporting Data Systems Change Policy

The table below includes the roles responsible for the tools and supports for this Data Systems Change Policy.

| Tool /Support  | Role Responsible  | Location  |
| --- | --- | --- |
| 12.1 Training(s) that support this policy. (kk) *(Training 1 name and description)* *(Training 2 name and description)* *(Include all trainings)*  | *(role responsible)* *(role responsible)*  | *(insert URL training location)*  |
| 12.2 Documentation that supports this policy. (ll) *(Document 1 name and description)* *(Document 2 name and description)* *(Include all documents, including any applicable forms or reports)*  | *(role responsible)* *(role responsible)*  | *(insert URL or document location)*  |
| 12.3 User input that is collected and used to support this policy. (mm) *(User input 1 description of input)* *(User input 2 description of input)* *(Include all user inputs)*  | *(role responsible)* *(role responsible)*  | *(insert URL or location with applicable content)*  |
| *(insert additional tools/supports as needed)* | *(role responsible)* | *(insert URL or location with applicable content)*  |