

## Explaining the DOL Data Stewardship Framework and Plan

The Washington State Department of Licensing is an agency of the State of Washington, a steward of data concerning the people of the state, and though it acts as a department of motor vehicles for purposes of US federal law (see Drivers Privacy Protection Act (DPPA), 18 USC 2721), we are unique in that we combine vehicles, drivers, business and professions.

Data is our principal asset, and the safety of data within the agency is an important component of the agency's strategy.

In accordance with that strategy the agency has formed a Data Management Office, appointed a Data Stewardship and Privacy Administrator, obtained funding from the legislature and launched a significant project to improve and sustain its data stewardship capabilities.

This document and related materials describe the agency's internal data stewardship framework both in plain language for the public and in more detail by reference to the mandates, commitments and compliance activities that govern the agency's work in this area. These documents are also important components of the project plan, and are shared with the agency's Enterprise Project Management Office, the state's Office of the CIO, the Office of Privacy & Data Protection, and stakeholders as appropriate. They are intended to remain public, non-confidential documents, and may be published, used and adapted freely by anyone.

## Background

The Department finds valuable guidance on privacy in the following mandates, and endeavors to align with them though they may not regulate our work specifically:

- [General Data Protection Regulation](#) (GDPR) – the privacy law foundation of the European Union
- Office of Management and Budget (OMB) [circular A-130](#) (2015) - Managing Information as a Strategic Resource
- National Institute of Standards and Technology (NIST) – [Privacy Framework](#)
- Office of the Information Privacy Commissioner (OIPC) [guidance document 1545](#) -- Accountable Privacy Management in BC's Public Sector
- Privacy Act of 1974 [5 U.S.C. 552a](#) – records maintained on individuals
- California Consumer Privacy Act, [A.B. 375, 2018](#)

Much of the groundwork for this effort was laid by DOL staff over the course of several years, beginning with the formation of the Data Governance Board in 2008 and a study by Quest Analytics, completed the same year.



## Principles, Commitments Commitments and Compliance

Washington State law has a firm privacy foundation in article 1 section 7 of the constitution, and multiple active legislative efforts have changed the landscape for DOL in recent years, including the following that govern our work directly:

- Use of Facial Recognition Services ([C 257 L 20 / SB 6280](#) 2020)
- Biometric Identifiers – State Agencies ([RCW 40.26 / HB 1717 2017](#))
- Keep Washington Working Act ([RCW 43.17.420](#) et seq / [SB 5497](#) 2019)

As a Washington state agency, DOL honors both privacy and transparency. Our public disclosure program handles over 20,000 increasingly complex and sophisticated requests per year, and has become the gatekeeper for all data requests coming into the agency.

DOL published an [Open Data Plan](#) in 2017, and contributes to [Data.wa.gov](#); some of our most popular datasets include:

- [Electric Vehicle Population](#) Data
- [Electric Vehicle Registration Activity](#)
- [Washington Drivers License In-State Migration](#)

### Our Framework as a Document

The framework (Appendix A) that accompanies this document was developed directly from Best Practices published by the Office of Privacy and Data Protection, which were in turn adapted from legislation in the Washington Senate in 2018, and Guidance on Big Data from the United Nations Development Group. The principles described here and in the framework are meant to be consistent with the diverse sources listed above. In addition to principles of data stewardship, the Framework document lays out the agency's existing commitments in the area of data stewardship, including statutes, rules, contractual obligations and policies, as well as activities that help us fulfill those commitments, and links to related elements of other stewardship frameworks in the wider world.



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## DATA Stewardship FRAMEWORK

	EXPLANATION	COMMITMENTS FOR DOL	HOW WE COMPLY	ALIGNS WITH:
LAWFUL, FAIR & RESPONSIBLE USE	<p>Data should be shared, collected, analyzed or otherwise used through lawful, legitimate and fair means. In particular, data access (or collection, where applicable), analysis or other use should be in compliance with applicable laws, including data privacy and data protection laws, as well as the highest standards of confidentiality and moral and ethical conduct.</p> <p>Data should always be accessed, analyzed or otherwise used taking into account the legitimate interests of those individuals whose data is being used. Specifically, to ensure that data use is fair, data should not be used in a way that violates human rights, or in any other ways that are likely to cause unjustified or adverse effects on any individual(s) or group(s) of individuals.</p>	<ul style="list-style-type: none"> <li>No DOL personnel will knowingly obtain or disclose personal information, from any record governed by the DPPA, for any use not permitted under section 2721(b), (DPPA 18 U.S.C. 2722)</li> <li>"Every internal and external data user meets the highest data privacy, protection, and management standards" DOL Strategic Plan</li> <li>"Executive and small cabinet agencies shall ensure their policies comply with Executive Order 16-01, Privacy Protection and Transparency in State Government, and that information collected from clients is limited to that necessary to perform agency duties. Policies must ensure that information regarding a person's immigration or citizenship status or place of birth shall not be collected, except as required by federal or state law or state agency policy." (Executive Order 17-01)</li> <li>Washington Public Records Act (RCW 42.56 and WAC 308-10)</li> <li>Disclosure of vehicle records (RCW 48.12.635)</li> <li>Agency Policies 1.7.1 – 1.7.12</li> </ul>	<p><b>Agency-Wide</b></p> <ul style="list-style-type: none"> <li>Data Governance Board</li> <li>Privacy Impact Assessments</li> <li>Data Sharing Agreements</li> </ul> <p><b>Public Disclosure Office</b></p> <ul style="list-style-type: none"> <li>First Point of Contact for records requests</li> </ul>	<ul style="list-style-type: none"> <li>GDPR article 5(a)</li> <li>GDPR article 6</li> <li>NIST Privacy Framework: Governance Policies, Processes, and Procedures (GV-PP-P)</li> </ul>

## Our Goals

DOL's principal goal and strategies for this project are described in the agency's strategic plan. Over time, these goals and strategies may evolve.

### Goal: Data Compliance (from the DOL Strategic Plan):

Every internal and external data user meets the highest data privacy, protection, and management standards.

This goal is associated with the following Strategies and Actions

**STRATEGY: Strengthen data privacy and protection:** Implement advanced data management policies, standards, technologies, and compliance audits.

**ACTION:** Develop & implement advanced data management policies, standards, and technologies

**ACTION:** Develop & implement advanced data management compliance audits

**STRATEGY: Develop data stewardship competencies:** Train and support employees to use the highest data privacy and protection standards for data collection, storage, and use.

**ACTION:** Develop data stewards for each data domain

**ACTION:** Train employees on highest data privacy & protection standards for collection, storage, & use



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## Measures

In order to accomplish the goals, DOL intends to measure the following aspects of our work and environment. These are initial measures, and will evolve as the agency progresses through the Plan described below; measures may be added, the calculations may change, and reporting will certainly change.

MEASURE	EXPLANATION	HOW IT'S CALCULATED	PRINCIPLES
External Data User Compliance	DOL is responsible for the privacy, protection, and management of millions of Washingtonians' data, so we insist on audits of other organizations that access and use that data.	Number of external data user audits in progress	DUE DILIGENCE FOR DATA PARTNERSHIPS  DATA SECURITY
External Data User Audit Aging	Audits should be performed periodically in order to monitor change over time. This helps us understand our agency risks, and identify changes in practice to reduce them.	Number of audits aged >180 days	DUE DILIGENCE FOR DATA PARTNERSHIPS
Internal Data User compliance	DOL as an agency is the steward of millions of Washingtonians' data, so we train employees for compliance with the agency's risk mitigation standards	Number of DOL employees trained or reviewed	LAWFUL, FAIR AND RESPONSIBLE USE
OCIO Project Status	Technology is an important part of our plan, and implementation will be complex. The OCIO will provide oversight and assign a project status using its dashboard so that we can allocate resources for success.	OCIO methodology is red-yellow-green	OPEN DATA, TRANSPARENCY & ACCOUNTABILITY
Data Volume	DOL is responsible for collecting, protecting and responsibly using data about millions of people, vehicles and professions. This is the denominator for any measure of the impact of a data incident.	Number of records in all applications in the DOL application inventory	DATA RETENTION & MINIMIZATION
Data Variety	For each license, registration or credential, DOL is responsible for collecting, considering and protecting certain key business data elements. This is the approximate number of things we know about a person.	Number of fields in all applications in the inventory.	DATA RETENTION & MINIMIZATION
People Affected	The number of people who have been affected by DOL data incidents (breach or near miss). Some data incidents affect only one or two people; more serious incidents could affect thousands. The target is zero people affected.	Number of people whose data has been compromised through leak, spill or breach by DOL or its partners.	PROTECT SENSITIVE DATA AND CONTEXTS  DATA SECURITY
Data Accessibility	In order to run effectively, DOL programs need ready access to data about their work. The agency Data Governance Board is responsible for assessing and identifying key data elements to make this possible.	% of critical data elements identified by data governance board that are available to business users	DATA QUALITY AND ACCURACY
Data Completeness	In order to make the best decisions, an agency need good data. But sometimes omissions occur in data stores.	% of required data elements that are missing (e.g. customer addresses)	DATA QUALITY AND ACCURACY
Data Accuracy	Because DOL data is used to determine important licensing status necessary for people to live, drive and thrive, our data needs to be accurate, and when we find errors we need to fix them.	Ratio of known errors relative to the overall size of agency data stores.	DATA QUALITY AND ACCURACY
Data Uniqueness	Duplicate records can confuse or stall agency work processes, so we try hard to make sure our data support "one person, one license."	# of duplicate records that are barriers to DOL operations	DATA RETENTION & MINIMIZATION



## Plan for Improving Data Stewardship

Having established the Data Stewardship Framework, the Department is carrying out a substantial project to increase the capacity of all staff to exercise the highest standards of data protection and privacy. A high level view of the project plan in Kanban form is [published online](#), and a snapshot in table and Gantt form is included below.

### Highlights of the Plan include:

- Recruitment of a Data Stewardship and Privacy Administrator
- Formation of the Data Management Office, including
  - o Data Sharing Unit, with contracts specialists and auditors
  - o Data Steward positions to be created across the agency
- Data stewardship training for all DOL staff
- Data Loss Prevention project, including:
  - o Data at Rest
  - o Data in Use
  - o Data In Motion
  - o Identity Access Management
- Development and adoption of a common data incident response process and register
- Refreshing the data inventory – a map of data assets across the agency, aligned with guidance from the State Archives
- Periodic reporting on progress and compliance
- Periodic updates to the Data Governance and Privacy Plan as well as the Privacy Framework

## For More Information:

Contact DOL's Data Stewardship & Privacy Administrator

Email: [DOLPrivacyOfficer@DOL.WA.GOV](mailto:DOLPrivacyOfficer@DOL.WA.GOV)

Phone: 360-902-0104

Visit DOL's website privacy pages:

[Privacy policy / statement](#)

[Making Data Requests](#)

[Driver and ID data Requests](#)

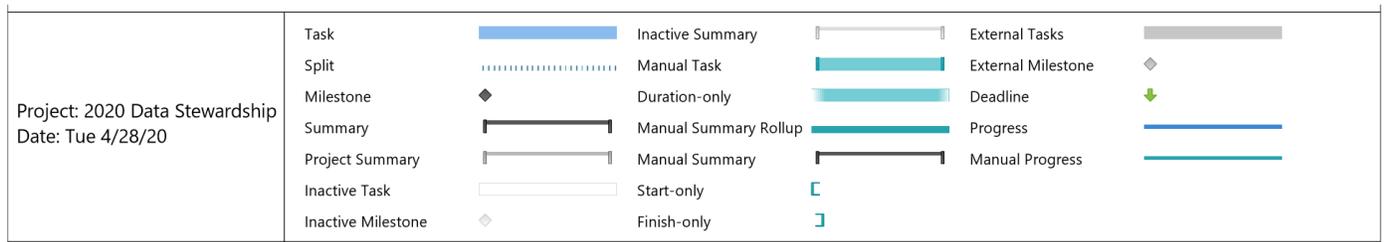
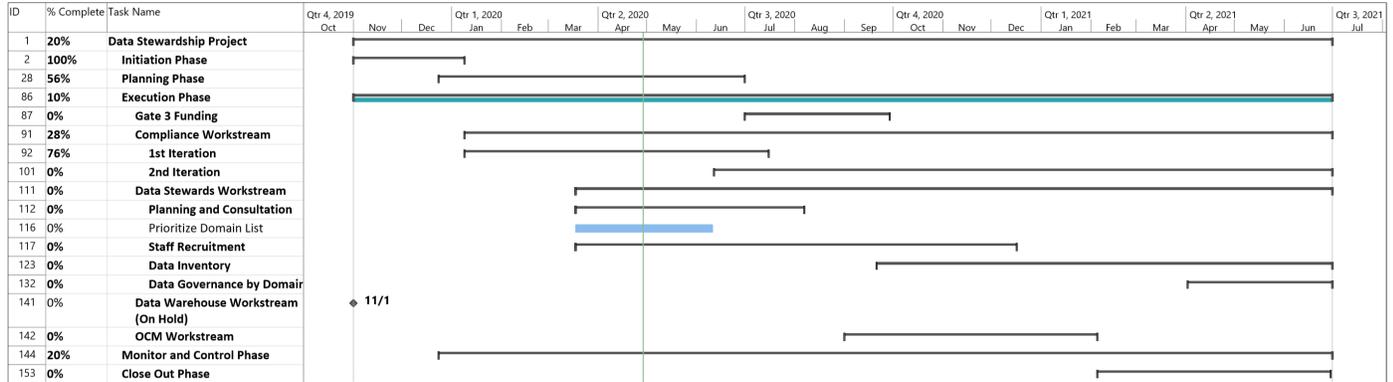
[Facial Recognition](#)



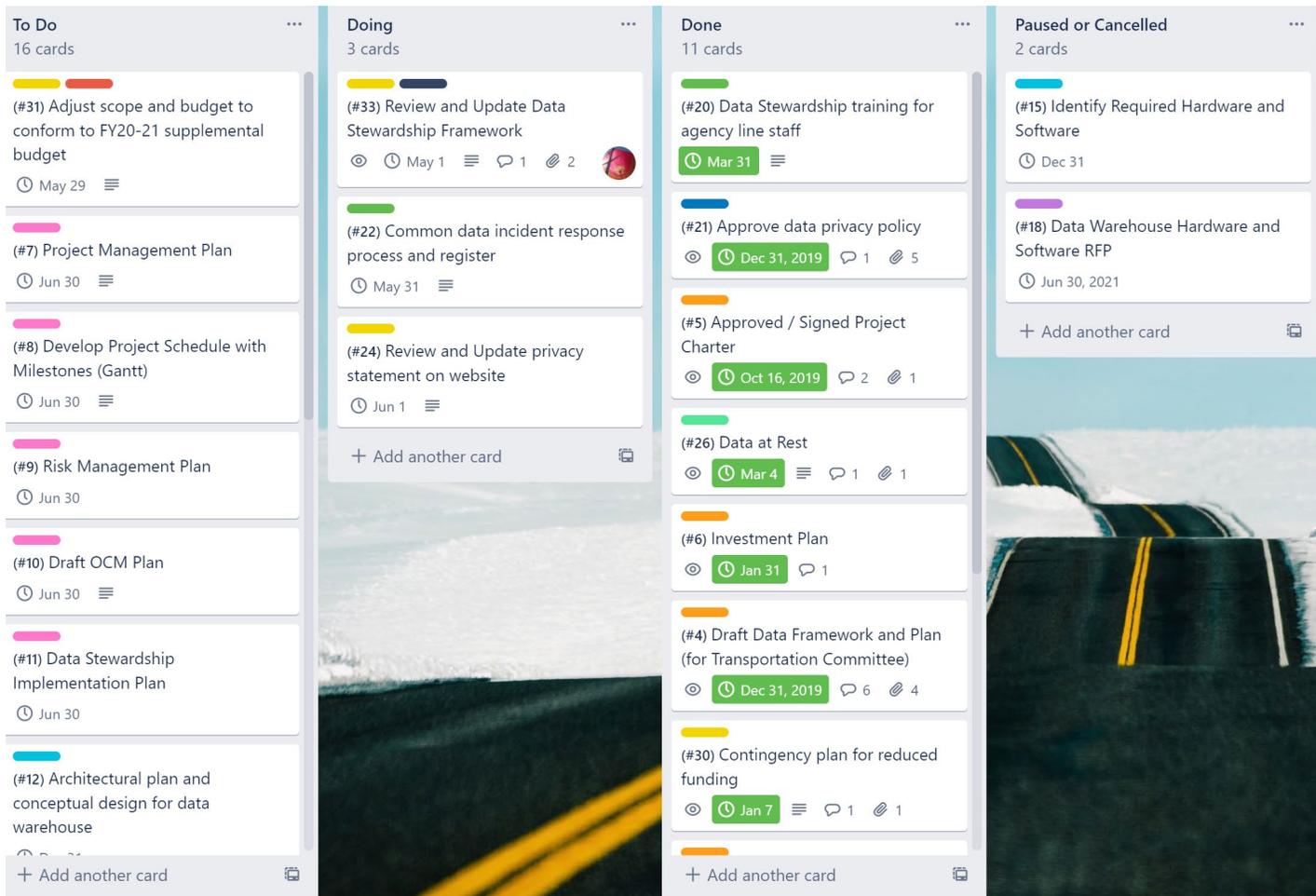
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## Plan Snapshots

The Kanban and Gantt charts below are a preliminary snapshot of the plan. The agency will update and republish the plan as a living document.



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The image shows a Kanban board with four columns: To Do, Doing, Done, and Paused or Cancelled. Each column contains task cards with titles, due dates, and icons for search, comments, and attachments.

Column	Card Title	Due Date	Comments	Attachments
To Do (16 cards)	(#31) Adjust scope and budget to conform to FY20-21 supplemental budget	May 29		
	(#7) Project Management Plan	Jun 30		
	(#8) Develop Project Schedule with Milestones (Gantt)	Jun 30		
	(#9) Risk Management Plan	Jun 30		
	(#10) Draft OCM Plan	Jun 30		
	(#11) Data Stewardship Implementation Plan	Jun 30		
	(#12) Architectural plan and conceptual design for data warehouse			
Doing (3 cards)	(#33) Review and Update Data Stewardship Framework	May 1	1	2
	(#22) Common data incident response process and register	May 31		
	(#24) Review and Update privacy statement on website	Jun 1		
Done (11 cards)	(#20) Data Stewardship training for agency line staff	Mar 31		
	(#21) Approve data privacy policy	Dec 31, 2019	1	5
	(#5) Approved / Signed Project Charter	Oct 16, 2019	2	1
	(#26) Data at Rest	Mar 4	1	1
	(#6) Investment Plan	Jan 31	1	
	(#4) Draft Data Framework and Plan (for Transportation Committee)	Dec 31, 2019	6	4
	(#30) Contingency plan for reduced funding	Jan 7	1	1
Paused or Cancelled (2 cards)	(#15) Identify Required Hardware and Software	Dec 31		
	(#18) Data Warehouse Hardware and Software RFP	Jun 30, 2021		



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