

**ACF Privacy and Confidentiality Analysis and Support**  
**Revised Case Study Outline**

**I. Introduction**

*[Source of section information: Informed by public website, site representatives via interview, community stakeholder, organizations supporting the site, with input from the expert panel and ACF]*

- A. Purpose of the Case Study
  - i. Should identify the target audience and what they should expect to gain
- B. Overview of the Site
  - i. Brief site description summarizing sponsoring organization, types of data that are being shared, and for what purpose(s)
  - ii. Why this site was chosen as a case study site
- C. Sources of Case Study Information/Who We Interviewed

**II. Motivation for Data Sharing**

*[Source of section information: Informed by public website and site representatives via interview]*

- A. Project [Enterprise] Goals
- B. Description of the Problem
- C. Data Sharing as a Solution
- D. Description of key supporters / champions

**III. Applicable Data and Requirements**

*[Source of section information: Informed by public website and site representatives via interview]*

- A. Types of data/ data elements that were considered for sharing / shared
  - i. What data is being shared at the sector/program level
- B. Laws & regulations relevant to the proposed data
  - i. What laws/regulations impact how this data is being shared/general limitations

**IV. Enterprise Level - Where it started + where it is now (Elements and order will vary by case study.)**

(Consider how each item was conducted before implementation of the data sharing initiative versus how these are accomplished now, where relevant.)

- A. Data elements that were shared
  - i. Specific details of PII data elements that are shared
- B. Data Governance Framework
- C. Internal/external users permitted to access data and associated controls
  - i. Policy Control
    - a. Rules for behavior
      - Internal users/obtaining access and protocols for use
      - External users/obtaining access and protocols for use
  - ii. Technical controls
    - a. Statistical confidentiality treatments (variable suppression, data coarsening, cell suppression, noise infusion, Differential Privacy, etc.)
    - b. Minimum necessary access to minimum necessary elements
- D. Processes for ensuring data quality and consistency

- i. Matching processes
  - ii. Data documentation
  - iii. Training
- E. Data Security
  - i. System risks/concerns
  - ii. Risk mitigation strategies
  - iii. IT functionality that support data security
  - iv. Transmission requirements
  - v. Storage requirements
- F. Discussion of the sharing agreements and high-level discussion on unique issues
  - i. How agreements differ across data owners
  - ii. How agreements differ by type of data use
- G. If/how was transparency achieved
  - i. Relevant communications

**V. Individual Project Level - Where it started / where it ended**

(Individual projects or data users identified through discussion with the site administrator.)

- A. Overview of a specific data-sharing project
- B. Data elements being shared
- C. See above for what else should be covered on a more specific basis
  - i. Obtaining access
  - ii. Matching procedures
  - iii. Statistical confidentiality treatments
  - iv. Data Security
    - Access
    - Transmission
    - Storage while in use
    - Deletion after use
- D. The Outcome of the Project

**VI. Data Privacy and Confidentiality Challenges (series of paragraphs based on challenge)**

*[Source of section information: Informed by site representatives and community stakeholders via interview]*

- A. Issues Raised by Stakeholders (e.g., data owners/data stewards, external, etc.)
  - i. Who was part of this discussion/who were the stakeholders?
  - ii. What were their individual concerns/what issues did they raise?
  - iii. Did stakeholders cite laws, policies, or local practice as barriers to data sharing?
  - iv. How was “trust” discussed/described?
- B. Response to each issue raised
  - i. Who/what staff were central to resolving issues?
  - ii. Where did staff go for information to resolve these issues?
  - iii. What finally resolved the issue?
- C. Timeline for resolving issues
- D. Challenges related to disclosure risk analysis and risk mitigation

**VII. Monitoring and Sustainability**

*[Source of section information: Informed by site representatives via interview]*

- A. Statistics on Data Shared/Data Used
- B. Sustainability/ Maintaining Funding
- C. Ongoing Monitoring/ Data Governance Activities
- D. Analyses Conducted Regarding Implementation and/or Outcome

**VIII. Lessons Learned and Best Practices**

*[Source of section information: Informed by site representatives via interview]*

- A. Lessons Learned – What Would They Have Done Differently?
- B. Best Practices – What Would They Recommend to Others?

Appendix A. Data Sharing Agreements

Appendix B. Other Site Resources