

CHHS Data Exchange Agreement Business Use Case Proposal Instructions

Step 1 – Develop the Business Use Case Proposal

The data requesting department is the primary developer and submitter of the Business Use Case Proposal (BUCP). It is required that the data requesting department engage with the data providing department in the development of the BUCP. To help identify data assets available and the appropriate data stewards to engage in another CHHS department, contact the Department's Data Coordinator early in the process. Email the AIO Governance Liaison at CHHS@osi.ca.gov to identify a department's Data Coordinator.

Step 2 – Submit the Proposal for Review

The data requesting department should formally submit the BUCP to the data providing department. The requesting Data Coordinator will notify the AIO Governance Liaison by sending an email to CHHS@osi.ca.gov indicating that the BUCP has been submitted for review. Include the BUCP name and the contact information for the data requesting and data providing departments.

During the BUCP review, the providing department considers if the BUCP meets “minimum necessary”¹ and “consistent with collection purpose”² requirements.

Step 3 – Approve or Dispute the Proposal

BUCP approval should be granted by either the Chief Deputy Director or the Program Deputy Director of both the requesting and providing departments. The Data Coordinators for each department must also provide their approval of the completed form. Other signatories may also be required to approve the BUCP, as appropriate. Once the BUCP is approved, the Data Coordinator from the data providing department will submit the signed BUCP and any associated attachments to the AIO Governance Liaison at CHHS@osi.ca.gov for filing.

If a BUCP is disputed, the providing department submits the BUCP dispute to the AIO Governance Liaison. The disputed BUCP enters into the CHHS governance process for

¹ **Minimum Necessary:** Sharing only the minimum amount necessary to accomplish the purpose of the use or disclosure, whether shared internally or with external parties. The minimum necessary for departmental sharing is based on the department's need to know as related to the project, initiative, need, or legal mandates. For internal use of received data, the amount of information necessary to accomplish the purpose varies by job title, classification, and/or function. Use within a department of received data is related to the need to know based on job function or legal mandates.

² **Consistent with Collection Purpose:** The requested data elements for collection connect logically with the statement of intended purpose of the dataset.

resolution. The providing department should document the reason for the dispute. As part of the BUCP review, a department's interpretation of the laws under its jurisdiction will be presumptively correct but is not final.