
Guidance on DBHDS DOJ Settlement Agreement Process Documents

Purpose: This brief guide provides information on the [DBHDS DOJ Settlement Agreement Process Document](#) (henceforth referred to as “process document”), specific to 1) when one is needed and 2) what may constitute the need for updates or changes to an already established process document on the standardized process document. Information is also provided on corresponding data attestations for process documents.

Background: The process document provides a standardized format that DBHDS process owners use to document process components. A process document is needed when data are generated for DOJ reporting requirements that have associated compliance metrics. The process document itself has embedded instructions beginning on page 1, along with associated examples that process owners use to complete the process document. Process documents and associated data are used to complete independent data validations and related data attestations to demonstrate compliance with reliable and valid data as part of Settlement Agreement reporting requirements. The process owner(s) can make needed updates to sections I-VIII of the Process Document for administrative and/or data methodology reasons (described below).

How to make updates to the process document:

Changes to the process document should be made by the process creator, process owner, or accountable executive. The staff that makes a change to a process document will update the name of the process with the next logical name in the sequence. For example, if the previous process document is named “XYZ Process_VER001”, then the updated process can be named “XYZ Process_VER002”. Regardless of whether the change is “administrative” and/or “data methodology” in nature, changes should be noted in the version control area in section II (e.g. “changed name of process owners” or “updated data methodology for step 5 of process”). Additionally, an updated version of the process document will be saved with an altered version name. Make note of the change on the document in the relevant sections and be mindful of the following areas for updates: version number and revision dates on page 1 of the process document, person who last updated the process, the corresponding use of the Version control tracker in section II, the process document iteration name update in the footer of the document, and the corresponding saved name of the updated process document.

Changes that do not require an updated data attestation (administrative):

Administrative changes to a process document do not require an updated data attestation. Examples of administrative changes may include (but are not limited to) the following:

- The process owner changes
- A modification to the name of a report
- Roles and responsibilities, or associated job titles, are modified

- The process document template itself is modified and the process is transferred to an updated template
- Approver/approval method is modified
- Location of where documents are stored changes (e.g. Box to Teams)
- *In summary, modifications that do not impact how the data are received by the data user/process owner and/or are generated for reporting purposes are considered administrative changes and do not require an updated data attestation*

Changes that require an updated data attestation (data methodology):

The following data methodology would necessitate an update to the process document and a related re-attestation for the related data. An updated data attestation should align with the date and name of the corresponding updated process document. Examples of data methodology changes may include (but are not limited to) the following:

- If data set(s) derive from a source system where DBHDS staff used coding (e.g. Sequel) to obtain the data and there is a modification to the coding that alters the data set from the previous coding such that there are impacts how data are generated for reporting purposes
- If changes are made to process steps that modify how data are generated for reporting purposes
- If there is a change to the data source that alters the data or how the data are generated for reporting purposes
- If there are mitigation strategies that alter how the data are generated for reporting purposes
- *In summary, modifications that impact how the data are received by the data user/process owner and/or are generated for reporting purposes are considered data methodology changes and would necessitate an update to the process document and a related re-attestation for the related data*

Data attestations and validations

The data attestation and validation process has been created to assure that the process steps and risk mitigation steps (when applicable) effectively address threats to data reliability and validity. When the process document requires validation of data and a related attestation, the process document owner will work with the DBHDS Settlement Agreement Team (e.g. Assistant Commissioner for Developmental Services, Director of Transition Network Supports, DS Project Manager, etc.) for independent validation of the related data by DBHDS Information Technology Data Analyst. The DBHDS Information Technology Data Analyst will use the current iteration of the process document, related data, and any relevant report/visualizations to complete the validation of the data and process. The validation process may also involve a preliminary meeting between the process document owner and the DBHDS Information Technology Data Analyst to review the process document, data, and related report(s)/visualization(s) prior to independent validation. The DBHDS Information Technology Data Analyst will subsequently complete an independent validation of the process document and associated data, **including review of any related risk mitigation strategies and their effectiveness from the process document, to assert the validity of the process and its related mitigation strategies.** If the process and data are found to be

reliable and valid, an associated attestation document is produced and signed off by the DBHDS Chief Data Officer. If the process and data are not found to be reliable and valid, the process owner/subject matter expert is provided with feedback from the DBHDS Information Technology Data Analyst regarding any deficits and additional mitigation strategies needed.