

IT'S TRANSPORTATION FOR ALL OF US

Task 2-C:

Data Privacy and Data Management Plan



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ITS4US Program Overview

- A USDOT Multimodal Deployment effort, led by ITS JPO and supported by OST, FHWA and FTA
- Supports multiple large-scale replicable deployments to address the challenges of planning and executing all segments of a complete trip

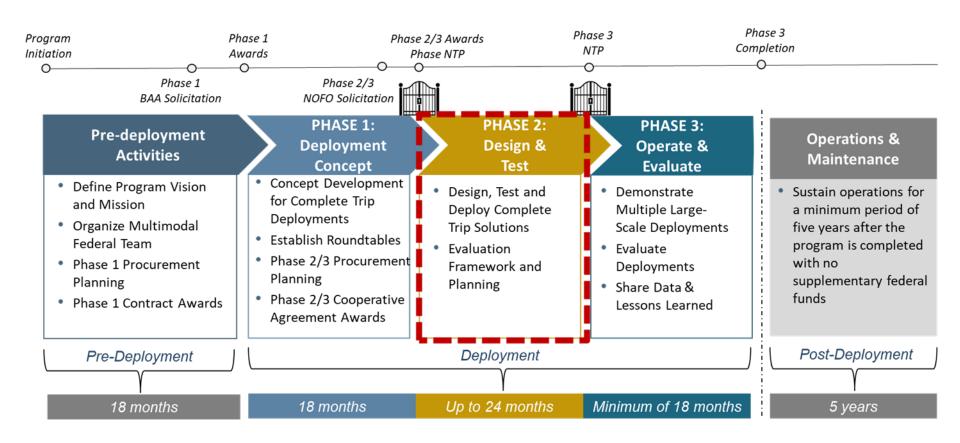


Vision: Innovative and integrated complete trip deployments to support seamless travel for all users across all modes, regardless of location, income, or disability





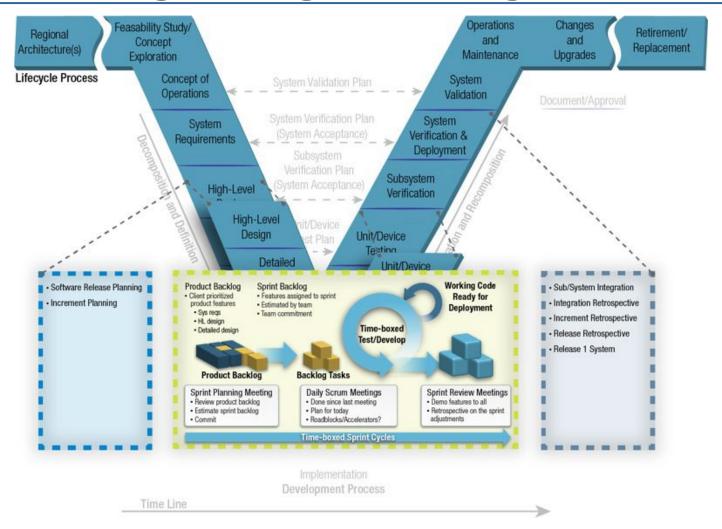
Deployment Phases







Systems Engineering "Vee" Diagram



(Source: FHWA 2007 and modified by Noblis 2017)





Task 2-C: Data Privacy and Data Management Planning







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Task 2-C: Data Management Planning

Task 2-C extends from Month 1 to Month 7. This task plans document how data will be collected, integrated, managed, protected, and disseminated during Phase 2 and Phase 3. This includes real-time and archived data (specifically identifying data to be publicly shared) in systems managed by the Recipient and its partners.

Deliverables

- 1. Data Privacy Plan (DPP)
- 2. Phase 2 Data Management Plan (DMP)
- 3. Notice of Privacy Management Consistency





Task 2-C Deliverables*



1. Data Privacy Plan

- □ Draft. Award + 2.5 months
- Comments Award + 3.5 months
- Final Award + 4 months

2. Phase 2 Data Management Plan (DMP)

- Draft. Award + 5 months
- Comments Award + 6 months
- ¬ Final Award + 7 months

3. Notice of Privacy Management Consistency (Signed letter to USDOT only)

Final - Award + 4 months

*All dates are based on proposed schedule in the NOFO





Deployment Phases and Document Development

PHASE 1: Concept Development PHASE 2: Design & Test PHASE 3: Operate & Evaluate

Data Management Details

Rough

Defined

- Initial assessment of internal and external data format and sources
- Potential PII is determined
- Data management process should be clear
- Data agreements may not be confirmed
- IRB requirements may not be known

- Sample Data is collected and provided to USDOT
- Data schema and Metadata are defined
- Data Agreements are confirmed
- IRB, USDOT, and state requirements are addressed
- Systems are fully defined
- Baseline data maybe collected

- Live Data is collected
- Public Data and Metadata provided to USDOT
- DMP is finalized





Relationship between the Phase 1 DMP and Phase 2 DPP and DMP

Phase 1

Data Management Plan (DMP)

Covered Rough Details on Data Management, Privacy and Security Information

Phase 2

Data Privacy Plan (DPP)

- Access Requirements
- Security Assessment Threat Assessment
- Data Sharing/IRB
- Technical Security Controls
- Policy Security Controls
- Subcontractor Compliance

Data Management Plan (DMP)

- Management Plan
- Schedule
- Data Structure
- Stewardship and Owners
- Standards
- Performance Measure/Baseline
- Metadata





Phase 2 DMP and DPP

- Data Privacy Plan (DPP)
 - New Document using parts of the Phase 1 DMP and is consistent with PMESP, HUAS, and ConOps
 - Focuses on privacy and security including information from IRB and USDOT
 - DPP should NOT address state and local laws
- Phase 2 Data Management Plan (DMP)
 - Builds off Phase 1 DMP but provides more details
 - Adds sections on quality control and performance measure data
- Crosscutting (both DPP and DMP)
 - Data system description
 - Context Diagram
 - Re-Use/Sharing





Notice of Privacy Management Consistency

- Privacy Management Plan
 - NOT a deliverable to USDOT under this agreement
 - Privacy Management Plan can and should reference the material in the Data Privacy Plan (DPP).
 - Privacy Management Plan includes details on state and local considerations and includes the plan to adhere to these state and local laws not covered in the DPP.
- Notice of Privacy Management Consistency The Recipient is responsible only for submitting a Notice of Privacy Management Consistency (a one-page letter) to DOT. This informs DOT that a Privacy Management Plan has been completed prior to the finalization of the Data Privacy Plan.





Lessons Learned – CV Pilots

- Assess data collection needs and requirements.
- Have a plan for how the data will be handled both during and postdeployment.
- Implement data collection procedures and techniques that reduce the burden on the communications network and account for the limitations of backhaul bandwidth.
- Plan accordingly for data storage requirements.
- Adopt a metadata standard that all data providers agree to and comply with.

Source: https://www.its.dot.gov/pilots/cvp design test.htm





Tools and Support

USDOT Tools and Support

- DMP guidance http://ntl.bts.gov/publicaccess/creatingaDMP.html
- DOT Privacy Policy https://www.transportation.gov/individuals/privacy/dot-privacy-policy
- DOT Public Access Plan https://www.transportation.gov/mission/open/official-dot-public-access-plan-v11
- ITS Reference Architecture https://www.its.dot.gov/research_archives/arch/index.htm
- Connected Vehicles (CV) Pilots Lessons Learned https://www.its.dot.gov/pilots/success.htm
- ITS CodeHub https://its.dot.gov/code/
- ITS DataHub https://its.dot.gov/data/

Other Sources of Support

- NIST Federal Information Processing Standards (FIPS) classification https://www.nist.gov/standardsgov/compliance-faqs-federal-information-processing-standards-fips
- General Transit Feed Specification (GTFS) https://gtfs.org





ITS4US Contact Information

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Visit the ITS4US Deployment Program Website:

https://its.dot.gov/its4us/

ITS4US Deployment Program Video

https://youtu.be/pztl1lRyXAc



