

How to Identify the Data Custodian for the DMP SAQ

For organizations completing the CMS Data Management Plan Self Attestation Questionnaire (DMP SAQ) that need to identify the appropriate individual as the Data Custodian for the DMP SAQ.

- **The DMP SAQ only allows for a single Data Custodian.**
- The Data Custodian will be responsible for the observance of all conditions of use for the environment identified in the DMP SAQ, including the establishment and maintenance of security arrangements to prevent unauthorized use.
- The Data Custodian is not necessarily the person completing the DMP SAQ. The person completing the DMP SAQ may be someone from the Information Technology (IT) Security department or the data requester(s). The Data Custodian should be knowledgeable enough about the environment to address questions that may arise to include, but not limited to, questions involving Data Use Agreements (DUAs) that will be paired to the environment. The Data Custodian should be a person with the authority to sign the final attestation statement of the DMP SAQ.
- The Data Custodian will be the person responsible for the distribution of the Summary Report (Approval Letter) to the data requester(s). The Data Custodian may be contacted by the Data Privacy Safeguard Program (DPSP) or ResDAC to verify that a requester is allowed to use the approved DMP SAQ. This is to ensure that the data requested will be stored within the intended approved environment.
- A secondary point of contact needs to be identified on the DMP SAQ in addition to the Data Custodian. This secondary contact should be a person in the organization that can field any questions that may arise if the Data Custodian is not available or cannot be reached (e.g., sick, personal leave, etc.).



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