Information Technology Update
Tuesday, August 6, 2013

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www.hawaii.edu/infosec

Information Security Program

- [http://www.hawaii.edu/infosec/infosecprogram.html](http://www.hawaii.edu/infosec/infosecprogram.html)
  - Data governance & oversight
  - Information Security Risk Assessments
  - Policies & Procedures
  - Identity Management & Access Controls
  - Information Security Training & Awareness

Information Security Projects Update

- Server Registration
- Information Security Compliance Assessments (w/UH Internal Audit)
- Data Governance & Data Sharing Request Process Update
- UH Policy & AP Updates
- PII protection: Rollout of Identity Finder for desktops
- External Information Security Posture Assessment

Server Registration Stats (as of April 2013)
http://www.hawaii.edu/its/server/registration/

<table>
<thead>
<tr>
<th>Campus</th>
<th>Total Registered</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hilo</td>
<td>45</td>
</tr>
<tr>
<td>Manoa</td>
<td>442</td>
</tr>
<tr>
<td>West Oahu</td>
<td>6</td>
</tr>
<tr>
<td>System</td>
<td>52</td>
</tr>
<tr>
<td>Maui</td>
<td>48</td>
</tr>
<tr>
<td>KCC</td>
<td>64</td>
</tr>
<tr>
<td>Hawaii</td>
<td>28</td>
</tr>
<tr>
<td>HCC</td>
<td>24</td>
</tr>
<tr>
<td>Kauai</td>
<td>14</td>
</tr>
<tr>
<td>LCC</td>
<td>31</td>
</tr>
<tr>
<td>Windward</td>
<td>29</td>
</tr>
<tr>
<td>Other</td>
<td>78</td>
</tr>
<tr>
<td>TOTAL</td>
<td>861</td>
</tr>
</tbody>
</table>
Next Steps

- Conducted Random Audit
- Conduct a network survey – to find unregistered servers
- Annual update to begin Sept. 2013
- 2013 Annual Personal Information Survey:
  - http://www.hawaii.edu/its/information/survey/

Information Security Compliance Assessments

Originally presented by: Jeff Tomori, Internal Auditor

Overview

- Joint effort by Internal Audit and the Information Security Team to evaluate security risk and compliance with University policy at selected colleges, schools, and departments (Units).
- Units were selected by the Information Security Team based on their knowledge that the respective unit maintains Sensitive Information, as defined by University Executive Policy E.2.214 III. B.

General Process

- Contact the respective Unit to discuss scope and timing.
- Completion of Maintenance of Sensitive Information Survey.
- Conduct meeting and site visit with Unit.
- Inform the Unit of observations / recommendations.
Status

- Work Performed during January – March 2013
- Selected Departments/Schools
  - Financial Aid Services (All Campuses)
  - Community Colleges – Non-Credit Programs
  - John A. Burns School of Medicine
- Surveys completed and site visits for O’ahu units completed.
- Memo containing observations was circulated to each unit.
- Status report to the Board of Regents in progress.

Common Observations

- Background Checks
- Record Retention of Sensitive Information
- Cross-Cut vs. Strip-Cut Shredder
- Securing Physical Files containing Sensitive Information
- Encrypting electronic transmission of Sensitive Information using UH File Drop
- REMINDER: safe disposal of paper & electronic documents with sensitive info:
  - SHRED paper documents
  - Securely deleting electronic documents with sensitive info:
    - http://www.hawaii.edu/askus/706

Data Governance & Data Sharing Request Update

Sandra Furuto, Director of Data Governance
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E2.215: UH Data Governance Policy
http://www.hawaii.edu/svpa/ep/e2/e2215.pdf

UH Institutional Data Governance
Decision Rights Governing Institutional Data Systems

- Focus Areas:
  - Access
  - Data Sharing Requests
- Rationale:
  - Historically, departments managing these systems created their own processes
  - Seeking to establish a formal, systemic approach that is consistent and public
    - Discussions on the assignment of System and Campus Executive Data Stewards
### Authorization for Access to UH’s Institutional Data Systems (Draft 4/1/13)

<table>
<thead>
<tr>
<th>Business Area</th>
<th>Institutional Data System</th>
<th>Campus Executive Data Steward</th>
<th>System Executive Data Steward</th>
</tr>
</thead>
<tbody>
<tr>
<td>Finance</td>
<td>Kuali Financial System – KFS</td>
<td>VC for Administration</td>
<td>Director, Fin Mgmt and Controller</td>
</tr>
<tr>
<td></td>
<td>eThority</td>
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</tr>
<tr>
<td>Human Resources</td>
<td>PeopleSoft</td>
<td>VC for Administration</td>
<td>System Director of HR</td>
</tr>
<tr>
<td></td>
<td>HR Data Mart – HRDW</td>
<td>VC for Administration</td>
<td>System Director of HR</td>
</tr>
<tr>
<td>Research Administration</td>
<td>myGrant (Kuali Coeus – KC)</td>
<td>VC for Research and Director, ORS</td>
<td>Director, ORS</td>
</tr>
<tr>
<td></td>
<td>Cognos</td>
<td>VC for Research and Director, ORS</td>
<td>Director, ORS</td>
</tr>
<tr>
<td>Student</td>
<td>Banner (Student, Fin Aid, A/R)</td>
<td>VC for Students</td>
<td>Student and Fin Aid: AVP for Student Affairs A/R: Bursar</td>
</tr>
<tr>
<td></td>
<td>Operational Data Store (ODS)</td>
<td>VC for Students</td>
<td>Director, IRAO</td>
</tr>
<tr>
<td></td>
<td>STAR</td>
<td>VC for Students</td>
<td>UHM VC for Academic Affairs</td>
</tr>
<tr>
<td></td>
<td>Student Employment and Cooperative Education (SECE)</td>
<td>VC for Students</td>
<td>AVP for Student Affairs</td>
</tr>
<tr>
<td>Identity Management</td>
<td>Identity Management System (IMS)</td>
<td>Campus Security Lead?</td>
<td>Director, Technology Infrastructure, ITS</td>
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### Authorization for Data Sharing Requests (Draft 4/1/13)

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<td>Director, IRAO</td>
</tr>
<tr>
<td></td>
<td>STAR</td>
<td>N/A – self-service model (?)</td>
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### UH Institutional Data Governance

**Data Sharing Request Process**

3 Possible Options

1. **No approval required**
   - They do not involve data from a UH Institutional Data System
   - They involve aggregate level data only
   - They are based on federal/state compliance, regulatory reporting, accreditation, or audit requirements
   - They involve individual record level data being sent to other agencies under previously established contracts or MOAs

2. **Short form required**
   - Intended for Executive Data Stewards and other UH personnel who are requesting Institutional Data that are considered sensitive in nature to fulfill an administrative or academic requirement of the University.
   - These individuals have a legitimate educational interest in the data, however, they are not the Executive Data Stewards of the data.
Data Sharing Request Process

Possible Options

3. Long form required
   Intended for requests involving sensitive information that is beyond the legitimate educational interest of the individual requesting the data.

Policy Updates

Family Educational Rights and Privacy Act (FERPA)

Proposed Revisions to University of Hawaii Policy A7.022

What does FERPA do?

Provides three primary rights to students
- Inspect and review their education record
- Have some control over the disclosure of information from their education record
- Seek to amend incorrect education records
Other Important Policies Governing Sensitive Information

- E2.214 Security and Protection of Sensitive Information
  - Establishes guidelines for the identification and proper maintenance of sensitive information by the University of Hawaii.
- E2.215 Executive Policy on Institutional Data Governance
  - Establishes guidelines for the use and dissemination of information collected and maintained by the University of Hawaii.
  - The language in A7.022 has been amended to refer the E2.215 for resolving requests for access to data.

University of Hawaii policies A7.022, E2.214, and E2.215 are designed to ensure that sensitive information is collected and maintained by the University in an acceptable manner, protecting the rights provided to students under FERPA.

Major Proposed Revisions to UH FERPA Policy

- Reflect revisions to the federal regulations revised in 2010
  - Allowing restricted dissemination of directory information
  - Clarifying the allowance of release of information for research and Longitudinal Data Systems
- Conforming with E2.214 and E2.215
  - Adding in the role of Data Stewards
  - Adding in the role of the Data Governance Committee
- Other Clarifying Changes
  - Clearly defining University Officials and their roles
  - Clearly describing Legitimate Educational Interest
  - Clarifying restriction on re-disclosure of student information

Directory Information

- Certain biological information contained in the education records of a student which does not require the prior consent of the student for disclosure.
- Revision to list of items to reflect current business practices.
  - Removed contact information from list of items
- Updating notice to students to include conditions of disclosure.
  - Added qualifier that lists will not be provided
- Updating notice to clarify requests for non-disclosure
Directory Information

- Certain biological information contained in the education records of a student which does not require the prior consent of the student for disclosure.
- Current list includes:
  1. Name of student;
  2. Local address and zip code;
  3. Local telephone number;
  4. Major field of study;
  5. Educational level (i.e. freshman, sophomore, etc);
  6. Fact of participation in officially recognized activities and sports;
  7. Weight and height of members of athletic teams;
  8. Dates of attendance;
  9. Most recent educational institution attended;
  10. Degrees and awards received;
  11. Email address;
  12. Enrollment status (full-time and part-time)

Items with strikethrough will be removed from the list of directory information.

University Officials

Members of an institution who act in the student’s educational interest within the limitations of their “legitimate educational interests.”

- These may include faculty, administration, clerical and professional employees and other persons who manage student education record information including student employees or agents.
- It may also include organizations, contractors, volunteers, and others performing institutional services or functions that the institution would normally do itself.

Legitimate Educational Interest

The school official must have need to access student education records for the purpose of performing an appropriate educational, research or administrative function for the University.

Re-Disclosure of Information

- Include language to specify that University Officials may not re-disclose information from the student’s education record.
Records Management

- New Records Management Policy
  - Incorporate data governance considerations
  - Include digital considerations
  - Standardize/clarify definitions
- Update A8.450: Records Management Guidelines and Procedures
  - Consistent records retention schedule

Upcoming: Enhanced Data Classification Scheme

- E2.214: Security and Protection of Sensitive Information defines two categories: “public” and “sensitive”
- FERPA policy revision necessitates additional categories
  - Preliminary/suggested categories:
    - public, University/restricted use, sensitive, regulated
- Will try to have specific technical controls tied to each category
- STAY TUNED!

Identity Finder for Desktops

- 4000 licenses; using less than 1000
- License – “per person”
- “high risk” categories – scan desktops
  - e.g. units that handle sensitive information as part of daily business operations
- Install & run IDF on those computers on a regular basis
  - [http://www.hawaii.edu/askus/1297](http://www.hawaii.edu/askus/1297) (download)
  - [http://www.hawaii.edu/askus/1303](http://www.hawaii.edu/askus/1303) (PC)
  - [http://www.hawaii.edu/askus/1256](http://www.hawaii.edu/askus/1256) (Mac)

Browser Concerns

- Browsers keep information in “cache” & “cookies”
- When accessing PeopleSoft, a browser could retain sensitive information
- Clear your cache after accessing PeopleSoft: [http://www.hawaii.edu/askus/726](http://www.hawaii.edu/askus/726)
- Turn on “private browsing” to prevent your web browser from keeping any information after you close your browser
- Use one specific browser for PeopleSoft access
- AskUs article: Secure Web Browsing: [http://www.hawaii.edu/askus/922](http://www.hawaii.edu/askus/922)
New IT Initiatives

- System-wide document imaging project
  - UHWO & UHM A&R using Nolij
- Gauging interest in (for fee):
  - Desktop backup service (CrashPlan Pro)
  - Encrypted email
  - File storage/synchronization service (Box.net)

Questions?

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New IT Building

- Manoa campus between Bilger Addition & Physical Science Building
- Consolidate most of ITS
- Anticipate moving in by Spring 2014

http://www.hawaii.edu/itcenter