

## Committee of Data Stewards

October 23, 2008

### Discussion Item

- 1) Brad's overview of the new IT strategic plan for Indiana University
  - a. Information will be on OVPIT website in the near future; after President McRobbie sees the draft plan.
  - b. Final publication slated for early December
  - c. Mark indicated that once this is finalized the CDS needs to take a look at specific initiatives and see where we need to develop policies and initiatives to fit these. This is not a one-year endeavor, but more like 5 to 7 years (not 10 years). We've been coasting the last 3 years on the 1998 strategic plan.
  - d. Be sure these are broad enough to be adapted over the years
  - e. Questions:
    - i. Does it appear that UITS will have the funds to implement this? Brad answered that UITS is trying to find 5% per year reductions for 5 years to provide funds for these initiatives. Bulk of what we do will be with internal reinvestment. The other piece is working to leverage funds from units throughout the University.
- 2) Appropriate Use Agreement (UA)
  - a. Four aspects related to the UA
    - i. We need to decide whether we are going to require new employees and staff to get an account and go through the UA whether or not they have access to enterprise systems.
    - ii. We need to retroactively go back and find out who has never completed a UA and how to get this done.
    - iii. A discussion about whether or how we expire the UA periodically
    - iv. All users of institutional data who don't have a network ID (probably pretty small); would not go through Accounts Management System (AMS) so we wouldn't be able to get to them. How would we do this?
  - b. Today's discussion is to require ALL users to go through the UA.
    - i. Paul indicated that the document would need to be changed because it indicates users of institutional data.
    - ii. If changes to the wording must be done, we can do that with Merri Beth and her staff. It might also need some reorganization. Anyone with comments about the UA language as such, send those to Merri Beth. Does this need to be intertwined into Tool Kit language?
    - iii. Barry asked Susan and others from the academic community to run this up the flag pole first. Is there going to be an issue with faculty in going through and accepting the UA. Susan doesn't see any problem with including faculty. Beth did indicate that we had some feedback from one faculty on the UA; she was concerned that it suggested she was responsible for things beyond her control.

That was before the language was changed. Therefore, we need to let them know that there will be the education and training to back this up.

- iv. Mark says we have the safe data page; maybe we could put this link on the bottom of the UA. We should investigate whether or not we can do this technically. Mark indicated that we would take a look at the UA with these comments in mind.
- v. Steve moved approval of this proposal to require all employees to agree to the User Agreement after some edits to the language.

### 3) Open Records Law

- a. The easiest way for University employees is to start from the assumption that any record we have is an “open record”. We are a public institution; the most public thing we do is spend money. Therefore, financial data is public record. We do not have to provide the responsive record within 7 days of the request; this is wrong. The law requires that within 7 days you acknowledge the request and give them some idea of how you will proceed. For instance, our submission to the NCAA is on-line (example of something very popular).
- b. Kip noticed that in the UA, people are instructed to contact University Counsel if they get an Open Records request. This is very good. This is VERY important to be followed. If you get a request from a newspaper or other media outlet, send it to Larry McIntyre; he will involve University Counsel if appropriate.
- c. The kinds of exceptions:
  - i. Records that contain information that is declared not to be disclosable under Federal Law, e.g. FERPA. If it’s mixed, then you have to redact the FERPA records and only provide the disclosable data. Some data has so much information that you can still identify who the person is without names, etc. It almost always goes back to athletes. If this is the case, you still cannot give it out. Counsel will cite the exact exemption
  - ii. Third-party at the University’s request has provided confidential construction information. We asked the contractor for a certified payroll. This is not disclosable. This was appealed to the Open Records counselor and IU prevailed.
  - iii. Intra-agency and inter-agency materials may be exempted. If bids come in and people have marked confidential information on them, such as trademarks, etc. The point of having sealed bids is so that we get meaningful competition, so these are not disclosable until after the bid is let and awarded.
  - iv. There are mandatory exemptions from disclosure and then there are some discretionary exemptions (most personnel fits into this category). Student’s internet browsing falls under FERPA. There is an exemption for information that would jeopardize institutional systems. Exemptions for diaries, calendars, etc. People may voluntarily produce them, however. Paul noted that we DO NOT have to PRODUCE data if it does not already exist. In an electronic environment, if there is a way to assemble the information out of our databases, we ARE required to produce this. If we can generate a report, we have to, but we can

charge them for the cost to produce such a report. Who determines if we are going to charge them? In consultation with the units involved. We are entitled to charge \$.10/page; many times we don't because it is not worth it.

- v. You cannot ask why they want the information. Anyone may make such a request without challenge. Susan asked about aggregated information, how do you propose the question to them about exactly what they want? Tone and manner are very important in these instances. Do not challenge but try to get at what they really need/want. It is appropriate to provide information in batches; you cannot bring the work of the institution to a standstill. This is not invoked nearly enough according to the Open Records Counselor.
  - vi. In closing; the use of third-party hosted systems such as when the Board uses personal e-mail for official business, is a circumvention of the law. Do not have to custom-tailor a report exactly the way they want it, but you may have to produce a report and charge them for programming, copying, etc.
  - vii. Mark noted that somebody in responding to such a request may be looking at all of your e-mails. We actually go through and filter them, and then send them to IU Counsel for final distribution. Therefore, be careful, even about the subject of your e-mails.
- 4) The matrix put together by Awareness/Education; we are going to expand this to include the Executive Committee and the overall CDS.
- 5) Policy subgroup –
- a. The final draft was sent to the full committee; it will eventually have other documents attached to it for standards, best practices, etc. This is the draft that will be sent through the approval process.
  - b. No questions or comments from the group. Mark noted that if the group looks at this more closely and has any comments; please send them to Merri Beth directly. Therefore there could be a more final version.
  - c. Standards will be worked on by ex officio members of the committees, including a literature review for comment at a later time.
- 6) Education/Awareness
- a. Don explained the work surrounding “red hot” items. Vic and Dan put together a document describing a tool that might be used for access to such data. In the meantime, Mark charged the group to come up with a short-term product. This led to a discussion of an overall project plan which led to the matrix mentioned by Mark in 4) above. For short-term the subgroup decided to put together bullet points for an e-mail to be sent out alerting users about how to handle “sensitive data”. Mark and Merri Beth will take this information and put together the content for a mass mailing.
- 7) Access Provisioning
- a. The big initiative is to map out the processes for the major systems. We have HRMS and now SIS. In the meantime, a small group was charged to put together an overall view of what position authorization would look like. This group will also get back to documenting the current processes and see if there are ways to improve the current

processes. Don noted that this small group did not just concentrate solely on “role-based” access. It was more about a collaborative framework for provisioning access. The consensus was that this is a good document. Susan noted that this should dovetail well with the Identity Management Task Force; agreed.

- 8) Preservation/Retention
  - a. The primary topic at the last meeting was the use and storage of e-mail. The group came up with bullet points for a mass mailing to educate users about the use of e-mail at the University.
  - b. There was further discussion surrounding the whole topic of e-mail and what constitutes an institutional record. Kip indicated that she had attended an Archivist CIC meeting; and no one seems to have a definition of what an institutional record. Vic talked about David Allen’s “Getting Things Done”. Vic asked the question as to whether or not everything on a University server is considered an institutional record; not really. The committee felt that anything on the server was the property of the University.
  - c. Mark noted that in the near future this group will need to provide a definition of “institutional record.”
- 9) One item from Kevin – Northwest – used IU policy IT12 – not scanning servers for vulnerabilities. Talked about restore times and disaster recovery planning. Mark noted that other campuses can learn from the experience at NW by using a “virtual” server.
- 10) Merri Beth reported on incidents.

#### Action Items

- 1) Distribute Access Provisioning report (small group) to full CDS.
- 2) Phyllis will work with Dan to move on to the next system for flowcharting access provisioning.
- 3) Phyllis will send the bullet points for both pieces of the e-mail to the full CDS after the message is finalized by UPO.
- 4) Merri Beth will review any comments submitted for changes to the UA and make changes where appropriate before moving forward with requiring it of all employees.