PIRG Meeting Minutes 04/30/07

Identification

<table>
<thead>
<tr>
<th>Project Name:</th>
<th>Personal Information Risk Group</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project ID #:</td>
<td>N/A</td>
</tr>
<tr>
<td>Project Sponsor:</td>
<td>Susan Malisch</td>
</tr>
<tr>
<td>Topic:</td>
<td>Finalization of draft policies / Rollout, awareness, and training</td>
</tr>
<tr>
<td>Phase:</td>
<td>1</td>
</tr>
<tr>
<td>Date / Time:</td>
<td>04/30/07</td>
</tr>
<tr>
<td>Project Manager:</td>
<td>Joe Bazeley</td>
</tr>
</tbody>
</table>

Attendees: Larry Adams, Diane Asaro, Joe Bazeley, Laura Bulgarelli (Remote), John Campbell (Remote), Becky Gomez, Bethany Gryfalkis, Carol McCormack, Tim McGuriman, Cory O’Brien, Eric Pittenger, Jim Sibenaller, Brian Slavinskas, Kathleen Steinfels (Remote), Rob Thoma

Non-Attendees: Stacey Hughes, Sue Kilby, Clare Korinek, Susan Malisch, Christine Marciasini, Tim O’Connell, Carolyn Wright

Discussion Points

Briefly describe the points / issues / topics that were discussed.

- Finalization of Policies
  - Policies were reviewed by 3rd party (SMART).
  - Policies then went to the IT Executive Steering Committee for review. Some comments about specific policies, a few general comments, but generally positive overall. No major issues with any of the policies. The ITESC expressed their gratitude for the efforts completed regarding policies and looked forward to reviewing the rollout plan.
  - Changes to all policies
    - Add in a section for questions about the policy to be sent to DataSecurity@luc.edu.
    - Add in a section stating that failure to follow this policy can result in disciplinary action, up to and including termination.
  - Data Classification Policy
    - Gramm-Leach-Bliley Act abbreviated GLBA, not GLB.
    - Illinois Freedom of Information Act removed from list of policies that apply to Loyola because it only applies to state colleges and universities.
    - Groups that can designate information as Loyola Public changed to be Office of the President, General Counsel, and Institutional Research.
    - Appendix now includes short description of each referenced policy and a link for more information. A link to Loyola’s FERPA page was also added.
  - Physical Security Policy
    - Clean desk line added - that employees will, to the best of their ability, properly put away and secure paper documents.
    - An “if practical” statement was added to the cleaning staff section.
  - Electronic Security Policy
    - Link to Encryption policy added in Encryption section.
    - Link to Password standards added in Passwords section.
  - Data Identification Policy
    - No changes.
  - Disposal of Data Policy
    - Recipient of media for destruction clarified from ITS to ITS Information Security team.
    - Bonded shredding service information added to appendix. Purchasing listed as the contact for more information about the service.
• ITS Information Security team information added to appendix for additional information and for scheduling devices for secure deletion.
  o Encryption Policy
    • Added specific instructions about sending passwords in a separate message than the encrypted file. Even better to send the password through an alternate channel, like a phone call.
    • Fixed “Loyola” typo in Physical Transfer of Electronic Data section.
    • There was discussion around encrypting/decrypting email, and our current processes for transmitting sensitive data electronically. Most of our current transfer processes use a public/private key exchange. Advantages to this method include the ability to automate the process and no need to send a password with the file.
  o Compliance Review Guidelines
    • FERPA email changed to FERPA@luc.edu.
    • Data protection email changed to DataSecurity@luc.edu.
    • Compliance Review form renamed Data Security Compliance Review.
    • Certification now “to the best of my ability and knowledge”.
    • Checkbox added to confirm that all members of the department completed their Individual Compliance Review forms.
    • Individual Compliance Review form completed.
  o Data Breach Response Policy
    • No changes.

➢ Rollout / Awareness / Change
  o Announcement through Inside Loyola Weekly, but follow-up with in-person communications.
  o Target each division / department head.
  o Provide two types of training – one for compliance leads and one for end users.
  o Try to use a “train the trainers” style, where the compliance leads are trained first, then they lead/assist with training the rest of the staff in that department.
  o IT Executive Steering Committee recommended that, at a minimum, there be direct face-time with department heads and managers.
  o Make sure that the training is in simpler language than the policies.
  o Work with HR to tie this into New Employee training.
  o Work with HR to develop a “refresher” course for all employees on a recurring basis.
  o Work with Jorene Richards in HR.
  o Involve UMC in rolling this out. Spin as an enhancement to existing policies in departments that already have them, or as an extension of existing policies from certain departments to the whole university.
  o Subcommittee being formed to work on the training elements. Awareness would have to be address as well. Eric Pittenger volunteered to be on the committee. Cory O’Brien volunteered to assist with banking / credit card related section. Diane Asaro volunteered to serve as a test audience for the training. It was recommended that Jorene Richards be looped in as well. If anyone else is interested in assisting with this committee, please contact Joe Bazeley.

Decisions / Recommendations / Confirmations

1. 8 policies approved and will be forwarded to General Counsel with the minor changes recommended during the meeting.

➢ Subcommittee formed to create training and awareness materials.
## Next Steps / Follow-ups

Briefly describe any identified follow-up Tasks.

<table>
<thead>
<tr>
<th>#</th>
<th>Task</th>
<th>Owner</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Send all 8 policies to General Counsel.</td>
<td>Joe Bazeley</td>
<td>5/4/07</td>
</tr>
<tr>
<td>2</td>
<td>Create training and awareness materials</td>
<td>Training &amp; awareness subcommittee</td>
<td>6/11/07</td>
</tr>
</tbody>
</table>