SENSITIVE DATA SECURITY AND PROTECTION

SYSTEMWIDE

Audit Report 13-30
August 22, 2014

Members, Committee on Audit

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BOARD OF TRUSTEES
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## ABBREVIATIONS

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<th>Abbreviation</th>
<th>Full Form</th>
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<tr>
<td>CO</td>
<td>Chancellor’s Office</td>
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<tr>
<td>COSO</td>
<td>The Committee of Sponsoring Organizations of the Treadway Commission</td>
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<td>CSU</td>
<td>California State University</td>
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<td>IT</td>
<td>Information Technology</td>
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<td>ICSUAM</td>
<td>Integrated California State University Administrative Manual</td>
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EXECUTIVE SUMMARY

As a result of a systemwide risk assessment conducted by the Office of Audit and Advisory Services during the last quarter of 2012, the Board of Trustees, at its January 2013 meeting, directed that Sensitive Data Security and Protection be reviewed. The Office of Audit and Advisory Services had previously reviewed sensitive data at six campuses in 2011.

We visited six campuses from January 28, 2013, through August 30, 2013, and audited the procedures in effect at that time. Campus-specific findings and recommendations have been discussed and reported individually.

In our opinion, due to the effect of the weaknesses described above, the operational and administrative controls over sensitive data in effect as of August 30, 2013, taken as a whole, were not sufficient to meet the objectives stated in the “Purpose” section of this report. Areas of major concern include: information security governance and disposal of electronic records.

As a result of changing conditions and the degree of compliance with procedures, the effectiveness of controls changes over time. Specific limitations that may hinder the effectiveness of an otherwise adequate system of controls include, but are not limited to, resource constraints, faulty judgments, unintentional errors, circumvention by collusion, and management overrides. Establishing controls that would prevent all these limitations would not be cost-effective; moreover, an audit may not always detect these limitations.

Our audit did not examine all controls over sensitive data, but was designed to assess management controls, increase awareness of the topic, and assess regulatory compliance for significant sensitive data categories that are prevalent in the California State University environment.

The following summary provides management with an overview of conditions requiring attention. Areas of review not mentioned in this section were found to be satisfactory. Numbers in brackets [ ] refer to page numbers in the report.

INFORMATION SECURITY GOVERNANCE [5]

The California State University (CSU) had not adopted a common information security governance framework to provide assurances that information security initiatives were consistently and effectively implemented throughout the CSU system, and there were broad inconsistencies in the execution and effectiveness of the various campus information security programs.

DISPOSAL OF ELECTRONIC RECORDS [6]

Electronic data records stored in PeopleSoft and in document management systems were maintained indefinitely, rather than being retained and disposed of according to CSU policy.
INTRODUCTION

BACKGROUND

Integrated California State University Administrative Manual (ICSUAM) §8000.0, Information Security Policy, dated April 19, 2010, represents the most recent and specific guidance to campuses regarding the security and protection of sensitive data. It provides direction for managing and protecting the confidentiality, integrity, and availability of California State University (CSU) information assets and defines the organizational scope of information security throughout the system.

The policy states that the Board of Trustees is responsible for protecting the confidentiality, integrity, and availability of CSU information assets. Unauthorized modification, deletion, or disclosure of information assets can compromise the mission of the CSU, violate individual privacy rights, and possibly constitute a criminal act.

According to ICSUAM §8000.0, it is the collective responsibility of all users to ensure:

- The confidentiality of information that the CSU must protect from unauthorized access.
- The integrity and availability of information stored on or processed by CSU information systems.
- Compliance with applicable laws, regulations, and CSU or campus policies governing information security and privacy protection.

The policy further states that auxiliary organizations, external businesses, and organizations that use campus information assets must also follow the CSU Information Security Policy.

State Administrative Manual §5300 defines information security as the protection of information and information systems and equipment from a wide spectrum of threats and risks. Implementing appropriate security measures and controls to provide for the confidentiality, integrity, and availability of information regardless of its form (electronic, print, or other media) is critical to ensure business continuity and protection against unauthorized access, use, disclosure, disruption, modification, or destruction. Pursuant to Government Code §11549.3, every state agency, department, and office shall comply with the information security and privacy policies, standards, procedures, and filing requirements issued by the Office of Information Security and Privacy Protection in the California Office of Information Security.

At the CSU campuses, the information security officer has overall responsibility for the security and protection of sensitive data, which extends to all campus departments, colleges, and auxiliary organizations.
PURPOSE

Our overall audit objective was to ascertain the effectiveness of existing policies and procedures related to the administration and control of sensitive data; to determine the adequacy of controls over the related processes; and to ensure compliance with relevant governmental regulations, Trustee policy, Office of the Chancellor directives, and campus procedures.

Within the overall audit objective, specific goals included determining whether:

- Certain essential administrative and managerial internal controls are in place, including delegations of authority and responsibility, oversight committees, executive-level reporting, and documented policies and procedures.

- A management framework is established to initiate and control the implementation of information security within the organization, and management direction and support for information security is communicated in accordance with business requirements and relevant laws and regulations.

- All assets are accounted for and have a nominated owner/custodian who is responsible for achieving and maintaining appropriate protection of organizational assets, and information is appropriately classified to indicate the expected degree of protection.

- Security responsibilities are addressed with employees prior to the start of employment so that users are aware of information security threats and concerns and are equipped to support organizational security policy in the course of their normal work.

- Responsibilities and procedures for the management of information processing and service delivery are defined, and technical security controls are integrated within systems and networks.

- Access rights to systems, applications, and business processes surrounding sensitive data are controlled by means of user identification and authentication, based on business and security requirements.

- Formal event reporting and escalation procedures are in place for information security events and weaknesses, and communication is consistent and effective, allowing for timely corrective action.

- The information systems’ design, configuration, operation, use, and management are in conformance with statutory, regulatory, and contractual security requirements and are regularly reviewed for compliance.

- Contractual language addressing a third party’s responsibility for protecting sensitive data is appropriate.
SCOPE AND METHODOLOGY

The proposed scope of the audit, as presented in Action Item, Agenda Item 2 of the January 22 and 23, 2013, meeting of the Committee on Audit, stated that sensitive data security and protection would include review and compliance with Trustee policy, federal and state directives, and campus policies and procedures; procedures for handling confidential information; communication and employee training; encryption; tracking and monitoring of access to sensitive data; and retention practices for key records. If the sensitive data is maintained by a third party, we would review the involvement of campus information security personnel in the decision process; documentation of campus expectations for handling and securing the data; contract language covering security expectations; and monitoring of third-party performance.

Our study and evaluation were conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* issued by the Institute of Internal Auditors and included the audit tests we considered necessary in determining whether fiscal, operational, and administrative controls are in place and operative. This review emphasized, but was not limited to, compliance with state and federal laws, Board of Trustee policies, and Office of the Chancellor and campus policies, letters, and directives. The audit review focused on procedures currently in effect.

We focused primarily upon the administrative, compliance, operational, and technical controls over the security and protection of sensitive data. Specifically, we reviewed and tested:

- Information security policies and procedures.
- Information security organizational structure and management framework.
- Information asset management accountability and classification.
- Human resources security responsibilities.
- Administrative and technical security procedures.
- Access and configuration controls over networks, systems, applications, business processes, and data.
- Incident response, escalation, and reporting procedures.
- Compliance with relevant statutory, regulatory, and contractual security requirements.
- Third-party contractual language regarding handling of sensitive data.

Our testing and methodology was designed to provide a managerial level review of key security practices over sensitive data. Our review did not examine all categories of sensitive data; selected emerging technologies were excluded from the scope of the review. Our testing approach was designed to provide a view of the security used to protect only key computing and business processes.

During the course of the audit, we visited six campuses: Chancellor’s Office, Channel Islands, Dominguez Hills, Long Beach, San Bernardino, and San Francisco. We interviewed campus personnel and audited procedures in effect at the time of the audit.
OBSERVATIONS, RECOMMENDATIONS, 
AND MANAGEMENT RESPONSES

INFORMATION SECURITY GOVERNANCE

The California State University (CSU) had not adopted a common information security governance framework to provide assurances that information security initiatives were consistently and effectively implemented throughout the CSU system, and there were broad inconsistencies in the execution and effectiveness of the various campus information security programs.

We found several omissions and irregularities at the campuses reviewed, including the following, some of which are repeat findings from the prior Sensitive Data Security and Protection audits conducted in 2011:

 Campus information security organizational structures did not always provide for executive level oversight and support.

 Security initiatives were not consistently reported to campus executive management, and information security reporting did not always contain sufficient information to assist executive decision-making.

 Electronic files containing level one data were not always appropriately safeguarded.

 The security and control of sensitive data stored on paper documents was not always assessed by the information security department.

 None of the campuses had performed an inventory of protected data, nor could they provide a complete list of electronic and paper records.

 Data ownership was not consistently assigned, and record retention guidance was not being followed.

 Background checks for student assistants with access to level one sensitive data were not always performed.

 Employees with access to sensitive data did not always complete security training.

Integrated California State University Administrative Manual (ICSUAM) §8000, Introduction and Scope, dated April 19, 2010, states that the Board of Trustees of the CSU is responsible for protecting the confidentiality, integrity, and availability of CSU information assets. Furthermore, the CSU Information Security policy should provide direction for managing and protecting the confidentiality, integrity, and availability of CSU information assets.

ICSUAM §8015, Organizing Information Security, dated April 19, 2010, states that each campus must develop, implement, and document the organizational structure that supports the campus’ information security program. The organizational structure must define the functions, relationships,
responsibilities, and authorities of individuals or committees that support the campus information security program.

The systemwide information security officer stated that the CSU information security policy had been issued but that the chancellor’s office (CO) had no capability to ensure that adequate security practices were implemented at the campuses.

Lack of appropriate governance for the information security function could create conflicting priorities, lead to suppressed discoveries, fail to adequately protect sensitive data, and result in inadequate or conflicting budgetary decisions for security projects.

**Recommendation 1**

We recommend that the CO adopt a common information security governance framework to provide the campuses with a baseline standard to ensure that information security initiatives are consistently and effectively implemented throughout the system.

**Management Response**

We concur. The information security management team will form a systemwide working group to review and advise on implementation of common information security governance frameworks (e.g., National Institute of Standards and Technology, ISO 27001). A framework will be identified and adopted to ensure that security initiatives are consistently and effectively implemented.

This recommendation will be completed by March 2015.

**DISPOSAL OF ELECTRONIC RECORDS**

Electronic data records stored in PeopleSoft and in document management systems were maintained indefinitely, rather than being retained and disposed of according to CSU policy.

Executive Order 1031, *Systemwide Records/Information Retention and Disposition Schedules Implementation*, dated February 27, 2008, states that each campus must ensure appropriate and timely disposal of records/information in accordance with retention and disposition schedule time frames. The campus is responsible for instituting a process for reviewing its records/information as listed on the schedules to determine whether they should be destroyed or maintained. At a minimum, this review should be conducted once a year. Additionally, each campus must establish procedures regarding the modification of retention and disposition schedules, as needed, to incorporate records unique to each campus. These schedules must be published by the campus, and copies are to be provided to the Office of the Chancellor, upon request.

The campus chief information officers stated that the document management and administrative systems that they used did not have an automated method to identify and delete records that had
reached the end of their retention period, or did not have the ability to parse out specific line items for removal.

Retention of records beyond their expiration date could make them subject to public records requests and could lead to unnecessary expenditure for their storage and maintenance.

**Recommendation 2**

We recommend that the CO notify the campuses of their responsibility to dispose of electronic records that have reached the end of their retention period.

**Management Response**

We concur. The CO will notify the campuses of their responsibility to dispose of electronic records that have reached the end of their retention period.

This recommendation will be completed by October 2014.
## APPENDIX A: PERSONNEL CONTACTED

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
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<tbody>
<tr>
<td><strong>Office of the Chancellor</strong></td>
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</tr>
<tr>
<td>Steve Relyea</td>
<td>Executive Vice Chancellor and Chief Financial Officer</td>
</tr>
<tr>
<td>Benjamin F. Quillian</td>
<td>Executive Vice Chancellor and Chief Financial Officer</td>
</tr>
<tr>
<td>(At time of review)</td>
<td></td>
</tr>
<tr>
<td>Ephraim P. Smith</td>
<td>Executive Vice Chancellor and Chief Academic Officer</td>
</tr>
<tr>
<td>Bruce Briggs</td>
<td>Chief Information Officer</td>
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<tr>
<td>Mark Crase</td>
<td>Chief Technology Officer</td>
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<tr>
<td>William Perry</td>
<td>Chief Information Security Officer</td>
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<tr>
<td>Michael Redmond</td>
<td>Acting Assistant Vice Chancellor, Headquarters Building Security and</td>
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<tr>
<td></td>
<td>Strategic Initiatives</td>
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<tr>
<td><strong>California State University, Channel Islands</strong></td>
<td></td>
</tr>
<tr>
<td>Richard R. Rush</td>
<td>President</td>
</tr>
<tr>
<td>Herbert Aquino</td>
<td>Manager, Information Technology Infrastructure</td>
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<tr>
<td>Michael Berman</td>
<td>Chief Information Officer</td>
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<tr>
<td>Noel Buena</td>
<td>Property Coordinator</td>
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<tr>
<td>Renny Christopher</td>
<td>Associate Provost, Academic Affairs</td>
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<tr>
<td>Cynthia Coler</td>
<td>Director, Credentialing and Field Placements</td>
</tr>
<tr>
<td>Rachel Danielson</td>
<td>Academic Records Evaluation Specialist</td>
</tr>
<tr>
<td>Caroline Doll</td>
<td>Director, Special Projects for Finance and Administration</td>
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<tr>
<td>Ana Duran</td>
<td>Associate Director, Student Systems</td>
</tr>
<tr>
<td>Neal Fisch</td>
<td>Director, Enterprise Services and Security/Information Security Officer</td>
</tr>
<tr>
<td>Deborah Gravelle</td>
<td>Assistant to the Dean of Students</td>
</tr>
<tr>
<td>Arjelia Guillen</td>
<td>Coordinator, Disability Resource Program</td>
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<tr>
<td>Karen Jensen</td>
<td>Professor, Nursing</td>
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<tr>
<td>Rian Medlin</td>
<td>Director, Academic Personnel</td>
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<tr>
<td>Jason Miller</td>
<td>Senior Research Officer</td>
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<tr>
<td>Michael Morris</td>
<td>Lieutenant, Police</td>
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<tr>
<td>Jess Parades</td>
<td>Operating Systems Analyst</td>
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<tr>
<td>Anna Pavin</td>
<td>Assistant Vice President (AVP), Human Resources</td>
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<tr>
<td>Nitika Parmar</td>
<td>Associate Professor, Biology</td>
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<tr>
<td>Valerie Patscheck</td>
<td>Director, Procurement and Contract Services</td>
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<tr>
<td>Brian Pichette</td>
<td>Police Dispatcher II</td>
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<td>Amanda Quintero</td>
<td>Director, Sponsored Programs</td>
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<td>Ginger Reyes</td>
<td>AVP, Student Affairs, Enrollment Services</td>
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<td>Christina Salazar</td>
<td>Systems Librarian</td>
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<td>Sue Saunders</td>
<td>Director, Academic Advising and Learning Support Services</td>
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<tr>
<td>Louise Siefert</td>
<td>Administrative Analyst, Health Center</td>
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<tr>
<td>Cheryl Sund</td>
<td>Faculty Support Coordinator, Nursing</td>
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<tr>
<td>Ysabel Trinidad</td>
<td>Vice President, Finance and Administration</td>
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<tr>
<td>Daniel Wakelee</td>
<td>Assistant Provost, Academic Programs</td>
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<tr>
<td>Amy Wallace</td>
<td>AVP, Broome Library</td>
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</tbody>
</table>
**APPENDIX A: PERSONNEL CONTACTED**

**California State University, Channel Islands (cont.)**
Beth Williams  Advising Support Coordinator

**California State University, Office of the Chancellor**
Benjamin F. Quillian  Executive Vice Chancellor and Chief Financial Officer  
(At time of review)
Amy Ahearn  Financial Information Systems Administrator
George Ashkar  Assistant Vice Chancellor/Controller, Financial Services
Lilian Audet  Assistant Director, Finance
Sean Berry  Administrative Assistant
Judy Botelho  Director, Center for Community Engagement
Renata Bouwmeester  Assistant Director, Academic Services
Bruce Briggs  Assistant Vice Chancellor, Information Technology Services  
and Chief Information Officer
Anne Brown  Director, Foundation Programs and Services
Chris Canfield  Associate Budget Director
Lorissa Cheney  Financial Information Systems Specialist
Jolene Colman  Secretary, International Programs
Marco Garret  Assistant Director, Access Services
Ellyce Gordon  Property Clerk
Gerry Hanley  Senior Director, Academic Technology
Alexander Harwood  Information Security Officer, Chancellor’s Office
Kristy Hawman  Director, Human Resources (HR) Services
Yves Hepperle  Project Development Manager
Tammy Hines  Senior Manager, Common Management System, HR Systemwide
Linda Horan  Data Analyst/Learn Media Coordinator
Edward Hudson  Information Security Director
Melody Kojima  Assistant Director, Purchasing
Thoa Le  Director, Chancellor’s Office Budget
Adam Litman  Director, HR Technical Support Services
Monica Malhotra  Associate Director, Analytic Studies
Michael McBride  Director, Application Development
Dawn McKinley  Senior Manager, Compensation and HR Information Projects
Ty Melvin  Web Page Coordinator
Tony Modiri  Operations and Network Administrator
Ruth Hirai  Labor and Employee Relations Analyst
Marsha Hirano-Nakanishi  Assistant Vice Chancellor, Academic Research and Resource
William Perry  Chief Information Management and Security Officer
Tosha Pham  Applications Support Manager
Shannon Pringle  Production Manager, Summer Arts Program
Lori Redfearn  Assistant Vice Chancellor, Advancement Services
Michael Redmond  Acting Assistant Vice Chancellor, Headquarters Building Security and 
Strategic Initiatives
Tom Roberts  Director, Contracts and Procurement
Dana Ronson  Assistant Director, Student Affairs
DaMonique Sampson  Common Management System Functional Analyst/Programmer
Jason Solis  Associate Director, Network and Security Services
APPENDIX A: PERSONNEL CONTACTED

California State University, Office of the Chancellor (cont.)
Virginia Soto  
Student Funds Coordinator
Dana Twedell  
Manager, Facilities

California State University, Dominguez Hills
Willie J. Hagan  
President
Ronald Bergmann  
Associate Vice President (AVP) of Information Technology
Benjamin Boish  
Manager, Compensation & Training, Human Resources Management
Alisha Brown  
Workers’ Compensation Program Manager
Rene Castro  
Director, Faculty Affairs
Kathleen Chai  
Associate Professor, Nursing
Constance Chambers  
Analyst/Programmer, Student Information Services
Julia Chan  
Payroll Manager
Catherine Earl  
Director, Nursing
Michael Foo  
Operating System Analyst, Server Operations and Administration
Delores Lee  
Director, Financial Aid
Peter Kim  
Director, University Advisement
Lawrence Kimara  
Manager, Business Process Management
Jamie Dote-Kwan  
Professor, Special Education
Enola Thompson-Logan  
Support Services Administrator, Student Health and Psychological Services
Danny Lujan  
Director of Infrastructure
Wei Ma  
Electronic Resources Management Librarian and Reference
Janie MacHarg  
Director, Student Health and Psychological Services
Mitchell Maki  
Vice Provost, Academic Affairs
Chris Manriquez  
Chief Information Technology Officer
Juan Mejia  
Computing Consultant, Financial Aid
George McCalmon  
Operations Systems Analyst, Administrative Information and Common Management Systems
Brandy McLelland  
Director, Student Information Services and Registrar
April Mitchell  
Academic Resource, College of Education
Sandra Parham  
Dean, Library
Francisco Quinonez  
Director, Procurement, Contracts, Logistical and Support Services
Jill Richardson  
Master’s Entry-level Professional Nursing and Clinical Coordinator
Mary Ann Rodriguez  
Vice President, Administration and Finance (At time of review)
Ormond Rucker  
Office Manager, Faculty Affairs
Steven Sanchez  
Operating System Analyst, Server Operations and Administration
Miya Smith  
Assistant to the Deans, College of Natural and Behavioral Sciences
Rakesha Thomas  
Employment Manager
Sharon Tipple  
Clinical Instructor, Nursing
Karen Wall  
AVP, Administration and Finance
Patricia Wells  
Director, Disabled Student Services

California State University, Long Beach
Donald J. Para  
Interim President (At time of review)
F. King Alexander  
President (At time of review)
Chanel Acker  
Assistant Director, Student Health Services
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<tr>
<td>Scott Apel</td>
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<td>Brittany Beckwith</td>
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<td>Kit Van Wyk</td>
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<td>Gene Wohlgezogen</td>
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<tr>
<td>Tomás D. Morales</td>
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<td>Deletta Anderson</td>
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<td>Debbie Burns</td>
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<td>Cesar Caballero</td>
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<tr>
<td>Laura Carrizales</td>
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<td>Steve Cuddigan</td>
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APPENDIX A: PERSONNEL CONTACTED

California State University, San Bernardino (cont.)

Larry Cummins  Computer Lab Technician, WorkAbility
Grace Dempsey  Director, Records, Registration, and Evaluation
Risa Dickson  Associate Provost for Academic Personnel
Charlene Earl  Administrative Support Coordinator, Property Management
Karen Eastman  Administrative Analyst/Specialist, College of Arts and Letters
Twillea Evans-Carthen  Manager, Human Resources Programs and Employment
Lorraine Frost  Vice President/Chief Information Officer, Information Resources and Technology
Robert Gardner  Vice President, Administration and Finance
Lorena Gomez  Administrative Support Coordinator, Nursing
Juan Gutierrez  Director, College of Education
Kathy Hansen  Director, Procurement and Support Services
Ian Jacobs  Computer Resources Manager, Business and Public Administration
Beth Jaworski  Director, Services to Students with Disabilities
Lory Lewis  Assistant to the Dean, College of Natural Sciences
Karen Logue  Interim Assistant Vice President, Human Resources
Marita Mahoney  Associate Academic and Institutional Studies, College of Education
Annel Martin  Administrative Analyst Specialist, Student Health Center
Jim O’Linger  Information Technology Consultant
Roseanna Ruiz  Director, Financial Aid
Terry Schmitt  Counselor, Psychological Center
Tamanika Sells  Administrative Analyst/Specialist, Academic Personnel
Jonathan Smith  Automation Librarian
Patricia Smith  Director, Health and Counseling Centers
Renee Smith  Administrative Analyst/Specialist, College of Natural Sciences
Eva Sorrel  Librarian, Technical Services
Beth Stanton  Purchasing Manager
Javier Torner  Assistant Vice President of IT/Information Security Officer
Rosie Torres  Administrative Analyst/Specialist, Academic Personnel
Michael Verdi  Teaching Performance Assessments Coordinator, College of Education
Dung Vu  Analyst/Programmer, Enrollment Services
Grace Wichert  Administrative Support Coordinator, Human Resources
Christia Williams  Human Resources Manager, University Enterprises Corporation
Michael Zachary  Internal Auditor

San Francisco State University
Leslie E. Wong  President
Eva Allen  Associate, Academic and Institutional Studies
Michelle Anolin  Information Technology Consultant, Division of Information Technology
Zoila Baltodano  Business Office Manager, Cesar Chavez Student Center
Brian Beatty  Associate Vice President, Academic Affairs Operations
Maggie Beers  Director, Academic Technology
San Francisco State University (cont.)

Nicole Bohn  Director, Disability Programs and Research Center
Avi Chandiramani  Information Technology Consultant, Disability Programs and Research Center
Ronald Cortez  Vice President of Administration and Finance/Chief Financial Officer
Guy Dalpe  Managing Director, Cesar Chavez Student Center
Elizabeth Detrich  Administrative Analyst/Specialist, Library
Darryl Dieter  Director, Institutional Research
Tuan Do  Operating System Analyst, Enrollment Management
Derethia Duval  Director, Counseling and Psychological Services
Teresa Dziadu  Associate, Academic and Institutional Studies
Gerard Enriquez  Information Technology Consultant, Development Office
Charlotte Ferretti  Professor, College of Health and Social Sciences
Lucas Ford  Analyst/Programmer, College of Health and Social Sciences
Joellen Fung  Director, Identity Management and Portal
Longin Gogu  Director, Enrollment Management Technology
Mark Goodrich  Executive Director, University Property Management
Mig Hofmann  Information Security Officer
Barbara Hubler  Director, Financial Aid
Patricia Irvine  Associate Dean, Graduate College of Education
Craig Johnson  Information Technology Consultant, Academic Planning and Development
Carlos Romero-Julio  Information Technology Consultant, Graduate College of Education
Betsy Kean  Director, College of Education
Hao Khuu  Information Technology Consultant, Development Office
Phoebe Kwan  Associate Vice President and Chief Technology Officer
Thoreau Lovell  Associate, Academic and Institutional Studies
Franz Lozano  Associate Vice President, University Budget and Operations
Michael Martin  Interim Associate Vice President, Human Resources, Safety and Risk
Deborah Masters  University Librarian
Martin Masters  Information Technology Consultant, Division of Information Technology
Charles Meyer  Director, Facilities and Service Enterprises
Stephen Henry McCoy  Director, Faculty and Staff Employment Services/Human Resources Management Systems
Renee Monte  University Registrar/Privacy Officer
Delma Munoz  Manager, Campus Support Services
Teresa Ono  Director of Special Events, University Advancement
Stanley Pearsse  Administrative Analyst/Specialist, Fiscal Affairs
Vernon Piccinotti  Technical Services/Information Technology Manager, Cesar Chavez Student Center
Kenneth Piper  Operating System Analyst, Enrollment Management
Andrew Roderick  Information Technology Consultant, Academic Technology
David Rourke  Manager, Planning and Personnel
Karrie Drew Schmid  Administrative Analyst/Specialist, University Property Management
Wendy Schweitzer  Associate, Academic and Institutional Studies
Alastair Smith  Director, Student Health
APPENDIX A: PERSONNEL CONTACTED

San Francisco State University (cont.)
Stephen Smith  Director, Procurement
Andy Stockton  Information Technology Consultant, University Property Management
Venesia Thompson  Chief of Operations, University Advancement
Kasra Varzaghani  Associate, Academic and Institutional Studies
Patrick Wachira  Security Administrator, Human Resources
Georgianna Wong  Administrative Analyst/Specialist, Library
Ewa Zachoszcz  Administrative Analyst/Specialist, Graduate College of Education
DATE: September 16, 2014

TO: Larry Mandel  
Vice Chancellor and Chief Audit Officer

FROM: Steve Relyea  
Executive Vice Chancellor and  
Chief Financial Officer

SUBJECT: Sensitive Data Security and Protection System-wide Audit Report  
#13-30

In response to the "Incomplete Draft" report dated August 22, 2014, we are providing  
the enclosed management response.

Should you have any questions, please feel free to contact us.

SR: mpr

Attachment

c: Mark Crase, Interim Assistant Vice Chancellor and Chief Information Officer  
William Perry, Chief Information Security Officer  
Michael Redmond, Acting Assistant Vice Chancellor, Headquarters Budget,  
Security, and Strategic Initiatives
SENSITIVE DATA SECURITY AND PROTECTION

SYSTEMWIDE

Audit Report 13-30

INFORMATION SECURITY GOVERNANCE

Recommendation 1

We recommend that the CO adopt a common information security governance framework to provide the campuses with a baseline standard to ensure that information security initiatives are consistently and effectively implemented throughout the system.

Management Response

We concur. The Information Security Management team will form a system-wide working group to review and advise on implementation of common information security governance frameworks (e.g. NIST, ISO 27001). A framework will be identified and adopted to ensure that security initiatives are consistently and effectively implemented.

This recommendation will be completed by March 2015.

DISPOSAL OF ELECTRONIC RECORDS

Recommendation 2

We recommend that the CO notify the campuses of their responsibility to dispose of electronic records that have reached the end of their retention period.

Management Response

We concur. The CO will notify the campuses of their responsibility to dispose of electronic records that have reached the end of their retention period.

This recommendation will be completed by October 2014.
October 13, 2014

MEMORANDUM

TO: Mr. Larry Mandel
   Vice Chancellor and Chief Audit Officer

FROM: Timothy P. White
       Chancellor

SUBJECT: Draft Final Report 13-30 on
         Sensitive Data Security and Protection, Systemwide

In response to your memorandum of October 13, 2014, I accept the response as submitted with the draft final report on *Sensitive Data Security and Protection, Systemwide*.

TPW/amd