Sam Houston State University
A Member of The Texas State University System
Information Technology Services (IT@Sam)

Data Access Review Policy: IT-05

PURPOSE:

The SHSU Guidelines for Data Standards, Data Integrity and Security document designates authority and responsibility for the ownership of University enterprise operational data. Commensurate with these designated roles, the specified Data Owners and Data Custodians are designated the responsibility of ensuring the security of information is maintained by establishing controls to confirm compliance with official procedures and policies.

SCOPE:

The SHSU Data Access Review policy applies equally to all Data Owners and Data Custodians.

POLICY STATEMENT:

Data Owners and Data Custodians must:

1. No less than annually, document a complete review of parties having access to data under their area of responsibility.
2. Ensure data access reviews are performed more periodically, as deemed necessary by the Data Owner, relative to the risk of the data accessed.
3. Ensure any staffing changes are reflected as necessary to access authorizations, in a timely manner.
4. Ensure data access requests are reviewed, and granted or denied as appropriate based on essential University documented need, in a timely manner.
5. Ensure controls are established as required, or deemed necessary by the Data Owner, to ensure information security is maintained.
6. Maintain documentation of compliance with this policy.

The SHSU Information Security Officer (ISO) is designated the authority for oversight of this policy.

The ISO will:

1. Perform periodic reviews to assure compliance with this policy.
2. Notify the Information Resources Manager (IRM) of identified concerns and risks.

DEFINITIONS:

Data Access Review: The review and documentation of parties having access to data under the Data Owner's area of responsibility.

Data Custodian: The person responsible for overseeing and implementing physical, technical, and procedural safeguards specified by the data owner.

Data Owner: Departmental position responsible for classifying business data, approving access to data, and protecting data by ensuring controls are in place.

Information Resources Manager (IRM): Officer responsible to the State of Texas to manage SHSU information technology resources.

Information Security Officer (ISO): Officer designated to administer the university Information Security Program.

Related Policies, References and Attachments:

An index of approved IT@Sam policies can be found on the SHSU Information Technology Services Policies website at http://www.shsu.edu/intranet/policies/information_technology_policies/index.html. Reference materials, legal compliance guidelines, and policy enforcement are available in the IT-00 Policy Compliance Document.   The SHSU Information Security Program and SHSU Information Security User Guide are also available on the Information Technology Services Policies website.

Reviewed by: Mark C. Adams, Associate VP for Information Technology, January 30, 2015
Approved by: President's Cabinet, June 27, 2011
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