INFORMATION GOVERNANCE PROGRAM CHARTER

University of South Florida

Abstract

Institutional data is a strategic asset. For too long, information governance efforts have been siloed. A holistic approach via a consistent, repeatable and sustainable information governance program is vital in order to protect and improve the institution's security posture, brand and reputation. This charter is a living document aimed at providing a framework for improved transparency and accountability in the use, quality, storage and security of institutional data.

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David Lechner, Sr. Vice President for Business and Financial Affairs

Contents

Document History/Revisions

Version	Date	Summary of Changes	Author/Editor
1.0	10/21/2018	Initial draft by	Initial Working Committee
1.1	10/20/2020	Updated to reflect Information Governance Management Council	Sarah Thomas
1.2	2/15/2021	Updated to reflect collective input from Information Governance Management Council; proof editing	Sarah Thomas, Jenny Paulsen, Valeria Garcia

Key Points

- Data is foundational for digital business and analytics programs. Information governance is designed to consolidate processes, accountability and technology for <u>improved data literacy, quality, compliance, security and use of institutional data</u>.

- Information governance is a long-term program and involves organizational behavior change. It is a <u>team sport that requires the building of partnerships</u> and recruitment of team members from across the enterprise who will be appropriately dedicated.

- This document specifies the <u>context, objectives, scope and recommended organization</u> of the information governance program.

- This is a <u>living document</u> that will be developed and maintained in a graduated approach. Initial focuses will be on enterprise-wide data, followed by regional data. Mechanisms, tools, processes and policies required to support the program will be developed, refined and approved on an on-going basis.

Intake of projects or products that are a consequence of information governance efforts are out of the scope of this program and will be managed via already established protocols, such as the ITMC for technology projects.

Context

Institutional data is a strategic asset of University of South Florida (USF) and the appropriate management and use of data is critical to the University's operations and data-driven decision-making. Inappropriate use of data due to lack of standards, inconsistent taxonomies and definitions, data silos, lack of quality and ownership, can result in inefficiencies, mistrust and exposes the University to unwanted risk. A consistent, repeatable, and sustainable approach to information governance is therefore necessary in order to protect the security and integrity of the University's data assets, as well as the University's brand and reputation. Recognizing the need for a formalized information governance structure and policy, USF's Provost & Executive Vice President, Dr. Ralph Wilcox and USF's Chief Operating Office & Vice President John Long charged the Information Governance Planning Group, led by Chief Information Officer, Sidney Fernandes and Vice Provost, Dr. Theresa Chisolm, to develop and operate an institution-wide Information Governance Program. This program is aimed at improving consistency in the use of institutional data, increasing transparency with regards to sources and definitions, and establishing decision rights and accountability for data quality, reporting, access, storage and security.

Purpose of this Document

The Information Governance Charter serves to establish the Information Governance Program for the University of South Florida, and outlines the program's goals, scope, requirements and standards. It is recognized that information governance is not a one-time effort; but rather it requires ongoing operation and monitoring to support continuous improvement. It is also recognized that all data is not equal and that USF needs to identify what data needs to be governed, shared and managed. Therefore, USF will approach the Information Governance program in a graduated and adaptive fashion (described in the Graduated and Adaptive Approach section).

Related Policies and Regulations

- USF Policy 0-019: Confidentiality and Discloses of Protected Health Information (PHI)
- USF Policy 0-507: Data Management
- USF Policy 0-508: University Information Security Structure
- USF Policy 0-512: Information Technology Governance Structure
- USF Policy 0-515: Protection of Electronic Personal Information
- USF Policy 11-007: Data Submission to External Entities
- USF Regulation 2.0021 Student Records
- USF Regulation 10.017 Limited-Access Personnel Records

Scope

Information Governance is an organization-wide effort geared towards defining policies, standards, processes, roles, and metrics that ensure the effective and efficient use of information within the enterprise. It also encompasses *Data Governance* which is the overall administration of the confidentiality, integrity, availability, and usability of the data.

The initial scope of Information Governance at USF is the establishment and operation of a decision rights and an accountability framework that enhances transparency, ownership, security, speed and accuracy of data-driven decision making.

In the development of this framework, the following needs, how they are currently being addressed, and opportunities for improvement, will be considered:

(a) A culture of information literacy across the enterprise that allows constituents to identify, locate, evaluate, and effectively use information
(b) Policies and standards regarding data access, privacy, compliance, and security
(c) Formal and professional data stewardship necessary to ensure information quality
(d) Policies around Information Life Cycle Management
(e) Practices, processes and success metrics by which to operate information governance at USF

The University of South Florida deals with many different types of data. The Information Governance Program encompasses the following types of data:

- Student (Applicant, Undergraduate, Graduate/Professional, Alumni, Non-Degree Seeking, Athletics)
- Curricular
- Faculty & Employee
- Financial
- Space & Facilities
- Human Resources
- Operational Technical
- Research Financial & Commercialization
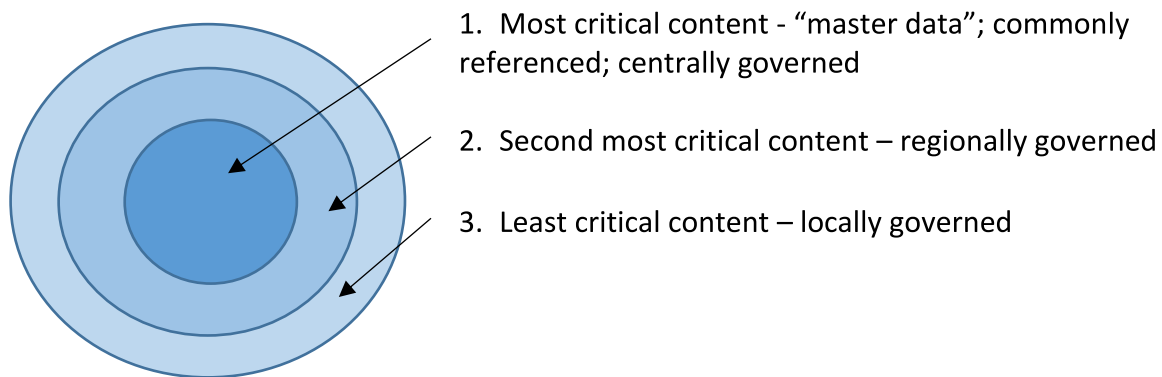- Athletics

Data currently Out-of-scope include:

- USF Clinical Data
- IRB requests - Data generated and/or accessed for research purposes
- Research Computing
- Direct Support Organizations
- Donor Information

Graduated and Adaptive Approach

The Information Governance Program will be developed with a graduated and adaptive approach. All data is not equal and some data is more important than others. Data at USF will need to be classified into the following categories in order to determine the appropriate Information Governance model for each and to explore which information artifacts are most critical/risky to most important business outcomes, processes or divisions.

1. **Master data** — The small amount of mostly structured data that is shared between most business applications and used day to day by business users tends to qualify as master data. Master data helps keep all data current between applications and so links critical business processes. Common types of master data are those describing customers, products and employees.

2. **Application suite data** — Data that describes products and customers (or other entities) but is used only within related applications or a suite of applications, and by business processes supported by those suites of applications. This is not master data as it is not shared across critical business processes or between applications.

3. **Single-application or single-use data** — This is similar to application suite data but is used only within a single business application and by very few end users.

The Information Governance program will be developed in a <u>graduated</u> fashion starting with the inner-most of the following 3 rings and progressing outwards:

1. Most critical content - "master data"; commonly referenced; centrally governed

2. Second most critical content – regionally governed

3. Least critical content – locally governed

The Information Governance Charter will be continuously updated through an adaptive process. The [Initial Working Committee](#) will meet at least once every six months to monitor and review the measures of success of the program, the current state of data issues and update the strategic plan and milestones as appropriate.

Goals and Objectives

The Information Governance Program aims to support USF's goals via the following objectives and associated strategies:

- Maintaining an intense focus on student success through providing timely information that enhances and accelerates collaboration, outreach and interaction across the USF community

- Providing timely data that helps measure and monitor performance towards metrics that promote USF as the best education destination in Florida thus attracting students to actualize their goals, while improving rankings of members and entities, satisfaction of member leadership and the performance of the institutions against the goals they have set for themselves

  These can be achieved through:

  – Improving transparency, responsibility and accountability for data confidentiality, integrity and availability
  – Improving data culture and literacy at USF through consistent, reliable and effective use of data at USF, thus reducing the risk of improper/illegitimate, incorrect, insufficient application of data, analytics and reporting used for decision-making by university leadership, internal data consumers, and external bodies

- Continuously organizing and adapting shared information resources to provide cost effective solutions for the institution. This can be achieved through:

  – Improving alignment amongst appropriate stakeholders in the development of data policies and practices
  – Creating best-practice change management processes to ensure consistency and stability
  – Reducing institutional cost by reducing redundancies in the creation and maintenance of enterprise datasets
  – Establishing and sustaining a robust, agile Information Governance program and strategy that anticipates and adapts to changes in higher education and technology

Guiding Principles

The Information Governance Program is driven by the following principles:

- **Transparency**
    - Accountable parties should provide clarity regarding how and when decisions are made and processes are created
    - Decisions and processes need to be audited to support compliance-based requirements
    - Data sources need to be certified or carry 'confidence/quality' ratings that provide users transparency into suitability of the data for their reporting needs
- **Accountability**
    - Formal roles should be defined and all members of the USF community, including data consumers, data owners, data stewards and data custodians, need to be accountable for their roles in supporting information governance standards, policies and processes around data accuracy, quality, access, etc.
- **Agility**
    - Strategy and processes should be periodically reviewed and modified when appropriate, to adapt the changing higher education and technical landscape
- **Change Management**
    - Accountable parties should initiate and communicate a concerted effort to manage changes regarding information management, policies and definitions
- **Business Value Driven**
    - Establish a clear line of sight between business value drivers, the information required to support them and key business process areas that are under the jurisdiction of the information governance forum
- **Metrics Driven**
    - Metrics that reflect process and behavioral improvements should be monitored and reported

Executive Sponsors

The Information Governance Program has the following executive sponsors:

- Ralph Wilcox – Provost & Executive Vice President
- David Lechner – Sr. Vice President for Business and Financial Strategy

Initial Charter Working Committee Membership

The initial working committee charged with drafting the Information Governance charter comprised the following members:

- USF Chief Information Officer – Sidney Fernandes
- USF Vice Provost, Strategic Planning Performance & Accountability – Theresa Chisolm
- USF Deputy Chief Information Officer – Jenny Paulsen
- USF Associate Vice President, Office of Decision Support – Valeria Garcia
- USF Assistant Vice President, Information Technology - Swapna Chackravarthy
- USF Associate Vice President, Information Technology – Patrick Gall
- USF Chief Information Security Office, Information Technology – Alex Campoe
- USF Data Administrator – Mariya Galchenko
- USF ERP Analyst – Kenneth Rodriguez

Governing Bodies

The Information Governance Program is overseen by four distinct governing bodies: The Information Governance Executive Council, the Information Governance Management Council, the Information Governance Working Committee(s), and the Data Owners Group. These groups are generally responsible for creating, modifying, and approving policies and procedures and in promoting environments that support data-driven decision-making.
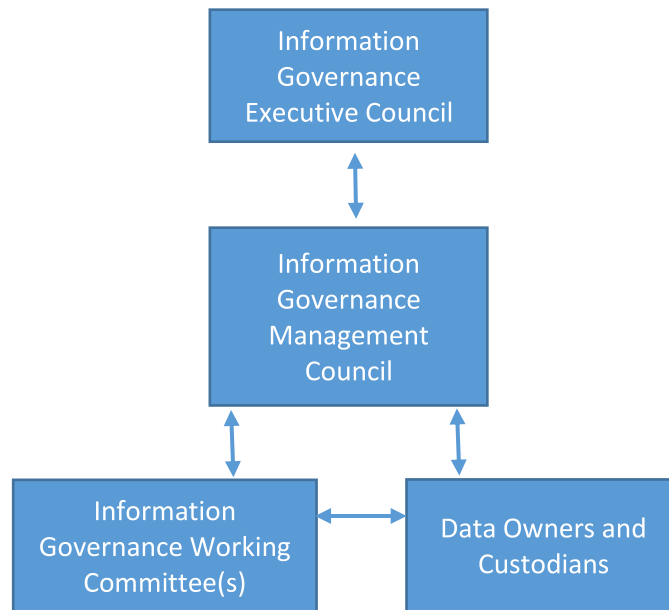
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Information Governance Executive Council

The Information Governance Executive Council consists of senior campus leaders who provide executive level guidance to the Information Governance Program.

Their responsibilities include:
- Final approval of policies and recommendation of regulations to the Board of Trustees.
- Prioritize and approve high-level data-related projects, including those related to risk mitigation.
- Advocate for resources needed to support the Information Governance Program.

The Information Governance Executive Council's membership is as follows:
- Provost & Executive Vice President
- Senior Vice President Business & Finance
- Senior Vice President for USF Health
- Vice President & Chief Financial Officer
- Vice President Information Technology
- General Counsel
- Vice Provost Strategic Planning, Performance, & Accountability

The Information Governance Executive Council will also include the following as ex-officio:
- Chief of Staff
- Communications & Marketing
- Research
- Others as deemed appropriate

The Information Governance Executive Council's operations are as follows:

- Decisions will be made per the Decision Matrix (Addendum B) and the associated working mechanisms.
- The Council will meet quarterly.
- Formal decisions on policy will be communicated to the Data Owner Groups, the Information Governance Management Council and the Information Governance Working Committee(s).
- Meeting Records: With the exception of confidential topics, meetings will be recorded in audio-visual format solely for the convenience of Council members to enable those who were unable to attend a particular meeting to hear the discussion. Recordings will be retained for no more than 45 days after the meeting date. Meeting minutes detailing the attendance record, topics, presenters, decisions, recommendations made, and action items will be retained as official historical meeting records in accordance with the university's general record retention requirements.

Information Governance Management Council

The Information Governance Management Council consists of campus leaders who provide guidance and recommendations to the Information Governance Executive Council.

Their responsibilities include:

- Recommendations of policies and regulations to the Information Governance Executive Council.
- Recommend approval and prioritization of high-level data-related projects, including those related to risk mitigation.
- Advocate for resources needed to support the Information Governance Program.

The co-chairs of this Council are the CIO and the Vice Provost for Strategic Planning, Performance and Accountability. The Information Governance Management Council's membership includes representation from the following units:

- Information Technology
- Academic Affairs
- Data Administrator
- Business & Finance
- Research & Innovation
- Communications & Marketing
- Athletics
- Audit
- USF Health
- General Council

The Information Governance Management Council operations are as follows:

- Decisions will be made per the Decision Matrix (Addendum B) and the associated working mechanisms.
- The group will meet monthly.
- Formal recommendations on policies will be communicated to the Data Owner Groups, the Information Governance Executive Council and the Information Governance Working Committee(s).
- Meeting Records: With the exception of confidential topics, meetings will be recorded in audio-visual format solely for the convenience of Council members to enable those who were unable to attend a particular meeting to hear the discussion. Recordings will be retained for no more than 45 days after the meeting date. Meeting minutes detailing the attendance record, topics, presenters, decisions, recommendations made, and action items will be retained as official historical meeting records in accordance with the university's general record retention requirements.

Information Governance Working Committee(s)

The Information Governance Working Committee(s) comprise select information managers, data owners, data stewards and data consumers who can speak to critical campus data/reporting needs as well as create plans to meet those needs. Some examples of these Working Committees are the Student Information Governance Working Committee and the Faculty Information Governance Working Committee. The primary focus is on enabling data-driven decision-making within the scope of the Information Governance Program.

Their responsibilities include:

- Draft and recommend standards, practices and policies to the Information Governance Management Council.
- Define, create, maintain and communicate information metadata.
- Recommend appropriate levels of resources (staff, technical infrastructure, etc.) and ensure that proper planning protocols are in place to support the data needs of the entire university.
- Prioritize the implementation of major elements of the new data warehouse and reporting environments, including storage, access/security, new reports/analytics that can answer campus data questions.
- Promote appropriate data quality and data integrity, including consistent data definitions and their application throughout connected systems.
- Promote, communicate and educate about Information Governance across the University
- Contribute and advise around the development of a campus data, standards and technology training program.

The Information Governance Working Committee's membership includes representation from the following units:

- IT (Deputy CIO, CTO, CISO, BI/Analytics)
- Academic Affairs (ODS, SASS, EPM, RO, Dean and/or Faculty rep)
- Data Administrator
- Business & Finance (Facilities, HR, Finance; Controller)
- Research & Innovation (Sponsored Research, Commercialization & Innovation)
- Communications & Marketing
- Athletics
- Audit
- USF Health
- General Counsel

The Information Governance Working Committee(s) operations are as follows:

- Decisions will be made per the Decision Matrix (Addendum B) and the associated working mechanisms.
- The group will meet bi-weekly at minimum.
- Meeting Records: With the exception of confidential topics, meetings will be recorded in audio-visual format solely for the convenience of the working committee members to enable those who were unable to attend a particular meeting to hear the discussion. Recordings will be retained for no more than 45 days after the meeting date. Meeting minutes detailing the attendance record, topics, presenters, decisions, recommendations made, and action items will be retained as official historical meeting records in accordance with the university's general record retention requirements.

Data Owners

Data Owners are formally   identified   university officers who   have ultimate policy-level responsibility and accountability for the data within their functional areas. They are charged with complete control over that information and can authorize or deny access to it as they deem appropriate.

Their responsibilities include:

- Following the University's data policies which outline the methods by which the Data Owner may use, collect, share, and store data that they own.
- Data Classification – determining the appropriate levels of classification for their data (Restricted, Sensitive, Public) and the appropriate access based on those classifications.
- Working with the Chief Information Security Officer (CISO) to develop access criteria and guidelines for each data classification.
- Ensuring that individuals with access to restricted data have completed required training and agreed to all statements of confidentiality
- Developing processes, procedures, tools and training to ensure that data is being used appropriately and all confidential information is being treated according to policy
- Assuring compliance with all legal and regulatory requirements for data in their areas.
- Authorizing user access to institutional data
- Periodically revalidating that user access to their data is appropriate.

The membership of the Data Owner Group(s) is determined by the types of data being governed. These are broadly classified in the "data types (within scope)" section of this document. Recommended membership for each of these data types is provided in Addendum C of this document.

The Data Owner Group(s) operations are as follows:

- Decisions will be made per the Decision Matrix (Addendum B) and the associated working mechanisms.
- The group will meet as needed.
- Minutes will be taken for each meeting and will be approved at the next meeting.

Data Custodians

Data Custodians are Information Technology professionals focused on the technologies used in data management and the tools that assist data users with the secure use of the data. Data Custodians are responsible   for implementing data   protection   policies as defined   by the institution's security policies and senior leadership. Data custodians perform all activities necessary to ensure the confidentiality, integrity, and availability of institutional data, and to fulfill the requirements and responsibilities delegated by Data Owners.

Their responsibilities include:

- Implementing all data management and protection policies established by Data Owners.
- Administering access to data as directed by Data Owners.
- Managing data storage based on classification.
- Maintaining a secure physical environment for the safe handling of data in compliance with regulatory requirements.
- Ensuring that the Disaster Recovery requirements for data are met.
- Facilitating the periodic performance of access entitlement reviews by Data Owners.

The Data Custodians operations are as follows:

- Decisions will be made per the Decision Matrix (Addendum B) and the associated working mechanisms.
- The group will meet as needed.
- Minutes will be taken for each meeting and will be approved at the next meeting.

ADDENDUM A: Milestones

1. Complete Information Governance Charter, communicate and distribute the same for discussion and the requisite approvals for the following:
   i. Goals and scope
   ii. Initial working committee membership
   iii. Governing bodies
   iv. Stakeholder list
2. Identify high-level business drivers and associated business metrics that can be impacted by Information Governance. Identify the relationships between business outcomes -> performance metrics -> business process metrics -> data metrics
3. Build the business case for data quality through documenting the effects of poor data quality on business KPIs and then targeting improvement on the same.
4. Establish mechanisms to measure program success using the metrics identified
5. Assign Authority and Resources
6. Identify a pilot project
   i. Establish a Data Dictionary/Taxonomy
      - Create a searchable data catalog
      - Create one clearly defined data dictionary and make it accessible (in access, navigation, process)
      - Establish definitions for various data elements
   ii. Establish an Accountability Framework
      - Identify roles and associated accountability
      - Identify governance domains
      - Create processes and mechanisms to enable and enforce accountability (create RACI model, communication model, decisions model and rules or order)
      - Establish mechanisms for version control
   iii. Create mechanisms for certification or data quality, integrity and accuracy
   iv. Establish polices around data access, privacy, compliance and security
   v. Establish polices around information life cycle management – data capture, maintenance, usage, publication, archival and purging
   vi. Identify and measure business metrics (baseline and ongoing)

Information Governance Program Charter   **University of South Florida**

ADDENDUM B: Decision Matrix

The governance structure is included below and shows those involved in decision making and their roles and responsibilities in each of the decision categories (domains).

The roles include:
- Input Required (blue) – required to provide input into the decision by sharing their thoughts and ideas and may be required to provide a recommendation to the decision maker
- Decision maker (red) – makes the final decision, taking into account any recommendations shared by those providing input
- Synthesizer (purple) – responsible for collating and sharing information relevant for the decision maker to make the final decision
- Override (*) – reviews the decision made by the decision maker and has the authority to override the final decision

Information Governance Program Charter Decision Matrix

Domain	Information/Data Needs							Information/Data Policies & Procedures							Data Access & Security						
Decision Makers	Student	Curricular	Faculty	Research	Finance	HR	Multi-Domain	Student	Curricular	Faculty	Research	Finance	HR	Multi-Domain	Student	Curricular	Faculty	Research	Finance	HR	Multi-Domain
IG Executive Council	*	*	*	*	*	*	*														
IG Management Council																					
IG Student Working Committees																					
IG Curricular Working Committees																					
IG Faculty Working Committees																					
IG Research Working Committees																					
IG Finance Working Committees																					
IG HR Working Committees																					
Student Data Owner																					
Curricular Data Owner																					
Faculty Data Owner																					
Research Data Owner																					
Finance Data Owner																					
HR Data Owner																					
Student Data Custodian																					
Curricular Data Custodian																					
Faculty Data Custodian																					
Research Data Custodian																					
Finance Data Custodian																					
HR Data Custodian																					
CISO															*	*	*	*	*	*	*

Legend

Responsible for synthesizing input for the decision makers
Decision Maker
Provides Input for decision
* Can override Decision Maker

ADDENDUM C: Data Owners Membership by Data Type

Student (Applicant, Undergraduate, Graduate/Professional, Alumni, Non-Degree Seeking)

- Registrar
- Undergraduate Studies
- Graduate Studies
- Decision Support
- Data Administration
- Financial Aid
- Admissions
- Innovative Education
- USF World
- Student Affairs
- Athletics
- Alumni

Ex officio: General Counsel, Audit, Information Technology, USF Health, Branch Campuses, Diversity, Equity and Inclusion, etc., as needed.

Curricular

- Data Administration
- Academic Affairs (Provost's Office)
- Registrar
- Undergraduate Council
- Graduate Council
- College Deans
- Decision Support
- Intuitional Effectiveness Representative
- Innovative Education
- USF World

Ex officio: General Counsel, Audit, Information Technology, USF Health, Branch Campuses, Diversity, Equity and Inclusion, etc., as needed.

Faculty

- Provost Office
- Decision Support
- Decision Support - Institutional Effectiveness
- Administrative Services
- Research & Innovation -Faculty Honors, Prizes and Awards
- Library
- USF Health
- Data Administration
- USF World

Ex officio: General Counsel, Audit, Information Technology, USF Health, Branch Campuses, Diversity, Equity and Inclusion, etc., as needed.

Additional Work Groups to consider as the Information Governance Program develops:
- Public Data Communication
- Financial
- Space & Facilities
- Human Resources
- Operational Technical
- Research Financial & Commercialization
- Athletics