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|  |  | **BASIC** | **STANDARDIZED****(compliance-focused)** | **RATIONALIZED****(risk-focused)** | **DYNAMIC****(governance-focused)** |
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| **PEOPLE** | **Executive Management** | *Disconnected*🞎 | *Supportive; receives status reports from individual business leaders*🞎 | *Supportive; receives & responds to consolidated status reports from executive leader, e.g. CIO*🞎 | *Same as Rationalized, plus actively, routinely engaged*🞎 |
| **Data Governance Organization** | *Localized, if any* 🞎 | *Individual governing bodies (e.g. by data domain)*🞎 | *Same as Standardized, plus a central governing body guides, coordinates, consolidates individual efforts*🞎 | *Same as Rationalized, plus central governing body forms/abolishes/re-structures individual groups to meet changing needs*🞎 |
| **Workforce & trusted partners** | *Roles and responsibilities unclear* 🞎 | *Roles and responsibilities defined and communicated locally*🞎 | *Roles and responsibilities defined and communicated at institution level*🞎 | *Same as Rationalized, plus executive management adjusts as needed*🞎 |

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|  |  | **BASIC** | **STANDARDIZED****(compliance-focused)** | **RATIONALIZED****(risk-focused)** | **DYNAMIC****(governance-focused)** |
|  |   |  |  |  |  |
| **PROCES** | **Guiding Principles** | *DG processes implemented ad hoc* 🞎 | *Localized, repeatable processes based on institutional guiding principles*🞎 | *Same as Standardized, plus duplicate processes eliminated and complex processes simplified*🞎 | *Same as Rationalized, plus processes continuously improved to optimize efficiency/effectiveness*🞎 |
| **DG****Organization** | *Disparate, localized groups use autonomous DG processes*🞎 | *Disparate, localized groups use standard DG processes*🞎 | *Hierarchical DG structure uses standard processes*🞎 | *Same as Rationalized, plus DG processes continuously improved*🞎 |
| **DG Requirements Definition** | *Localized, ad hoc translation of regulations into data compliance requirements*🞎 | *Standard process for translation of regulations into data compliance requirements*🞎 | *Same as Standardized, plus effort to ensure translation process works properly*🞎 | *Same as Rationalized, plus translation process continuously improved*🞎 |
| **Strategies & Policies** | *None* 🞎 | *Disparate, localized groups develop their own strategies and policies*🞎 | *Common DG strategies and policies*🞎 | *Same as Rationalized, plus strategies and policies continuously reviewed and updated*🞎 |
| **Control Environment** | *Ad hoc controls tuned for localized needs*🞎 | *Standard process for defining localized controls*🞎 | *Process and technical control synchronized to meet institution-level needs*🞎 | *Same as Rationalized, plus process and technical controls continuously reviewed and updated*🞎 |

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|  |  | **BASIC** | **STANDARDIZED****(compliance-focused)** | **RATIONALIZED****(risk-focused)** | **DYNAMIC****(governance-focused)** |
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| **TECHNOLOGY** | **Confidential Information Life Cycle** | *Inconsistently examined and documented*🞎 | *Examined and documented as standard practice*🞎 | *Same as Standardized, plus lessons learned applied*🞎 | *Same as Rationalized*🞎 |
| **Security Technology Domains** | *Reactive, ad hoc point solutions*🞎 | *With input from business units, central IT defines roadmap for comprehensive security infrastructure and implements components selectively (e.g., IdM, but not web application vulnerability scanning)*🞎 | *Central IT has technology in place to actively monitor use of and results from deployed security infrastructure components*🞎 | *Same as Rationalized, plus comprehensive security infrastructure fully and consistently deployed.* 🞎 |
| **Privacy, Confidentiality, Compliance Risk/Gap Analysis**  | *None*🞎 | *Independent working groups regularly conduct data risk/gap analysis*🞎 | *Imbedded in overall confidential information risk management program*🞎 | *Same as Rationalized*🞎 |