Campus IT Policy Development Seminar 11P

EDUCAUSE Annual Conference
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Our Agenda

12:30 Welcome and Introductions
12:40 Building the Framework
1:50 Social Media: The Intro
2:00 Break
2:30 Social Media: A Policy Writing Exercise
3:00 Lessons Learned in IT Policy
3:50 Wrapping Up
4:00 Adjourn

Your Current Challenges

• Lack of a roadmap
• Policies need to be reviewed and updated
• The approval process needs to be more timely
• Need ideas for enforcing policies and measuring compliance
• Lack of a strong policy infrastructure
• Time to focus on policy
• Distributed governance
• Need to develop more relevant policy
Your Workshop Goals

• A blueprint for developing IT policies and lessons learned
• Writing for regulatory compliance requirements
• Examples of well-written policies and sample documentation
• Best practices for organizing, locating and tracking policies
• Best practices for policy development and implementation
• Revisions vs. rewrites
• Quality vs. quantity of policies
• Techniques for engaging stakeholders
• Ownership, review process & governance

Building the Framework

Policy Goals

Consistent
Transparent
Clear
Responsibilities and Policies: U of M

Institutional Responsibility

Board of Regents
President (U System)
Senior Leaders including Chancellors

BOAD POLICIES
ADMINISTRATIVE POLICIES

President’s Policy Committee
Associated Senior Leader
Associated Chancellor
Policy Owner
Policy Owner
Policy Authority
Single Campus Policy Authority, except TC

To Consider

• Do you have a University-wide policy library?
• Are your IT policies contained within it or separate?
• Do you have a University-wide tool for developing/maintaining policies?
• Do you have a policy on policy?
• Do you have standard templates for your policy work?

Policies, Guidelines, Standards, Oh My!

Policies: A definitive course or method of action to guide and determine present and future decisions

Guidelines: Recommended practice that allows some discretion or leeway in its interpretation, implementation, or use

Standards: Written definition, limit, or rule, approved and monitored for compliance by an authoritative agency as a minimum acceptable benchmark.

Which of these are used by your institution?
Defining Policy

• The set of basic principles and associated guidelines, formulated and enforced by the governing body of an organization, to direct and limit its actions in pursuit of long term goals (Business Dictionary)
• A policy is a principle or protocol to guide decisions and achieve rational outcomes. A policy is a statement of intent, and is implemented as a procedure or protocol. (Wikipedia)

U of M: Policy on Policy

The University establishes administrative policies:
• to align operations;
• set behavioral expectations across the University system; and
• communicate policy roles and responsibilities.

U of M: Policy on Policy (Cont.)

• University-wide administrative policies must:
  • be warranted in order to (a) implement Board of Regents policy; (b) achieve compliance with laws, rules, or regulations; or (c) address a risk to the institution that cannot be adequately addressed elsewhere;
  • apply institution-wide or campus-wide;
  • have significant impact, including but not limited to, the number of people and colleges/units impacted and the level and number of risk factors involved; and
  • promote operational efficiency and effectiveness.
The Flow

**Predevelopment**
- Benchmark
- Scope
- Timing
- Ownership
- Resources

The Triggers (Issues)
- Changes in law, rule or regulation
- Weakness in current structure
- Change to governing policies (e.g., Board of Regents or Trustees)
- New technological opportunity
To Consider

• Who would be impacted?
• How widespread is the problem or need?
• What are the options for solving it?
• Is a policy needed to address the issue?
• Who owns the issue/policy? Is it an IT policy or a component of a broader business policy?
• What are the onetime and recurring costs associated with solutions?

To Consider: Risk and Impact

• Which risk area(s) are associated by the proposed policy?
  • Financial, reputational, managerial, legal
• What is the potential user population for the policy (audience and count)?
• What is the probability of a failure without a policy?
• What is the impact of a likely failure?
To Consider

• Does your institution use writing committees?
• Does the policy concept need to be approved in advance of drafting?
• Is there a policy plan that must be completed?
• How and when will you engage your stakeholders?

Stakeholder Engagement

• Gather concerns/requests in during the predevelopment phase
• Include representatives in your writing team
• Select individuals to review initial draft
• Meet with core customer groups
• Include the full population during a fixed review period prior to publishing

Pen to Paper (or Fingers to Keyboard)

• Draft the policy language
• Review with own management, if required
• Review with stakeholder representatives, and revise if needed
• Obtain required approvals
Policy Approval: U of M

- Process/policy owner obtains internal management approval
- Presents to a policy advisory committee
- Presents final draft to President’s Policy Committee (PPC) for approval
- 30-day open campus comment period
- Final approval from PPC chair

Communication and Training

- Identify your audience(s), the communication method, and timing
- Customize your message based on the role of the audience
- Ensure that training, if required, is available once the policy is approved

Documentation
Oversight
Review
Enhance
To Consider

- Should you make historical versions readily available, vs. available upon request?
- Do you save any of the draft versions of the policies?
- How long should you retain policy versions?
- Who will keep the “working” documents?
- Do you need physical or electronic approval prior to posting a policy or policy revision? Is documentation of this retained anywhere?

The “Official” Policy Home

- A University-wide administrative policy library or policies held on local (HR, IT, etc.) sites
  - Best practice: single site for all policies
  - One-stop shop for end users
  - Many of the policies are related so this facilitates movement between policies
  - More consistency possible

Documentation

- Maintain historical and current policy version(s)
  - Assists with legal queries
  - Supports standing practices (e.g., students are permitted to go by policies that were in effect when they matriculated)
  - Provides the historical view
  - Highlights key changes
  - History “snapshot” available in the policy itself
Keeping Policies Fresh

- Reminders sent when policies should be reviewed
- Comprehensive review
- Regularly scheduled reviews
- Provide data from analytics
- Provide maintenance pages

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Communicate

Who
What
When
How

Communicating Policies

- Audience
- Messenger
- Clarity of message
- Frequency
- Right communication vehicle(s)
- The view long-term
- “Put your ear to the ground”
Clarity of the Message

• Be direct
• Specify the change date
• Develop targeted communications appropriate for the different audiences
• Contrast the changes (old, new)
• Highlight the need or rationale for the change
• Extend the offer of help (if staffed for it)

Techno-Speak

• Limit sentences laden with technical phrases
• Ensure that you have a complete definitions section
• Provide examples where useful
• Test the communication out on representatives from your target audiences

Getting the Word Out

• Orientation agendas
  • Speakers, handouts, videos
  • Direct emails, mailings
  • Educational postcards, posters, etc.
  • Desk side coaching
  • “I agree” statements to click through when obtaining accounts, registering to the network, etc.
• Partner with tech staff in units
• Key policy lists for new employees
• Signed user agreements, if appropriate...
• Have a traveling road show!
  — Anyone who shows an interest!!!
• Hold policy brown bags
• Sponsor a “Policies Day”
Legal requirements
Institutional view

To Consider

• Do you, as policy owners, have an institutional requirement to know how compliant your audience is with your IT policies?
• Is there an expected frequency for monitoring?
• Do different policies have different requirements?
• Is there management support for addressing non-compliance?
• What are your enforcement options?
• Do you have staff to adequately monitor and enforce your IT policies?

Enforcing IT Policies

• The groundwork includes:
  • Understanding your culture
  • Identifying partners
  • Clearly defining roles
  • Establishing procedures

And educating the community about all four!
The “Cost” of Unenforced Policies

- Legal
- Reputational
- Financial
- Managerial

The Cost to Enforce Policies

- People (resources)
- Marketing/communication expenses
- Competition with other priorities
- Internal politics (big brother)
- Management support

Consequences of Enforcement

- Intentional vs. unintentional
- Punishment as an example may have an unintended consequence for the broader organization (no one will speak up)
To Consider

• Who maintains IT policies in your organization?
• Are routine and comprehensive reviews on a schedule?
• What triggers the frequency of reviews (e.g., importance, most frequently used)?
• Is there a formal process to follow?
• How do you capture your audience feedback on the policies?

To Consider: Policy Review

• Is it still needed?
  • For example, do you have technical controls in place that prevents the activity that used to be controlled by policy.
• Are the thresholds, approval levels, requirements appropriate for the risk managed? What would be the impact of changing these?
• What have been the weak points in the policy?
• What is the level of compliance?
Comprehensive Review

- Policy owner updates when needed (contacts, etc.)
- Annual reminder to review policy for accuracy
- Comprehensive review every 4 years
- Requires completion of a form
- Flows through established committee structure

Periodic Review

- Alignment of policy specifics to practice
- Alignment of procedures to actual
- Required vs. best practice
- Accuracy of the supplemental information (contacts, links to related information, forms, etc.)
U of M Model: Critical Success Factors

- Stakeholder consultation
- The “right” review/approval groups
- Transparency and accountability
- System of organization
- Templates
- Strong policy website
  - If you build it, they will come.
  - If you build it WELL, they will come back.

Resources

- EDUCAUSE Policy Digest newsletter
  http://www.educause.edu/PolicyDigest
- EDUCAUSE Policy Discussion Group
  POLICY-DISCUSSION@listserv.educause.edu
  Concern to the campus IT policy community.
- Information Security Guide
  www.educause.edu/security/guide
- ACUPA (Assn of College and University Policy Administrators)
  www.acupa.org
- A Framework for IT Policy Development
  Rodney Petersen | EDUCAUSE Review | January 1, 2004
  http://www.educause.edu/ero/article/framework-it-policy-development

Questions?

Michele Gross, Director
University Policy Program
University of Minnesota
Social Media: The Intro

What does your campus currently communicate to the University community re: use of social media, and how?
Social Media: The User Appeal

• Instant information
• The ability to connect with a large number of people on a regular basis

Social Media: The Commercial Appeal

• Can reach customers faster, in multiple ways
• Can view comments about the company/brand
• Ability to track marketing campaigns (increased traffic/sales)

(Dilbert comic strip)
The Challenges

• The blurring of personal and public information
• Once published, there’s no “going back”
• Lack of good judgment

The Ugly

• Bullying
• Disclosures re: drug or alcohol use
• Threats of violence
• Discriminatory remarks, harassment
• Trade secrets or copyrighted materials

Break

We’ll be starting again at 2:30pm
Social Media: A Policy Writing Exercise

Key Policy Development Questions

• What do peer institutions do in this area?
• Who would own the policy?
• How would it be monitored?
• What are the consequences policy violations?

With whom would you need to consult before creating/publishing a policy on social media use?
Reviewer Recommendations

• General Counsel
• University Relations
• Faculty
• Student governance
• Other employees

Policy Alternatives

• Enhance the Acceptable Use policy
• Guidelines
• Communication campaign

Lessons Learned in IT Policy
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Please fill out the session evaluation!