



Faculty Senate Archives

Faculty Senate

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Presentation on Third Party Data Transfer
International Travel
August 22, 2022



WICHITA STATE
UNIVERSITY

Faculty Senate

Third Party Data Transfer
International Travel

August 22, 2022

- **Mark Rodee, Chief Information Security Officer**

- Team of 4 (CISO, security engineers, security analysts)
- Reports to the Vice President for Finance and Operations
- Information Security (InfoSec) is charged with:
 - Protecting the University's electronic data and information technology system from information security threats
 - Securing and protecting the confidentiality of University, student, faculty, staff, and third-party information
- General contact information:
 - Ext. 3650
 - Askinfosec@wichita.edu or Mark.Rodee@wichita.edu

- **Misha Jacob-Warren, Deputy General Counsel**

- Team of 5 attorneys, 2 support staff
- Reports to the President
- Provides and coordinates all legal services for the University
 - Ex.: contracts, litigation, open records requests, immigration, bankruptcy, policies, ethics, etc.
- General contact information:
 - Ext. 6791
 - General.counsel@wichita.edu

Privacy & Security of Data in 2022

- Cloud vendor management
- Data transfers
- Multi-factor authentication
- Remote learning / work
- Security of research (internal / external)
- Student data privacy / governance
- Ransomware / Malware
- Cyber infrastructure needs
- Regulatory issues (e.g., Cybersecurity Maturity Model Certification (CMMC), NIST 800-171, FERPA, HIPAA, GDPR, PCI, Export Control, FTC, Gramm-Leach-Bliley Act, Consumer Data Privacy Legislation, etc.)
- Bring Your Own Device (BYOD) issues
- Cyber liability insurance
- International Travel

We are challenged to do something different

- The State of Kansas requires all state institutions to vet Cloud Services and bulk data transfers
 - Kansas Information Technology Executive Council (ITEC) 7230a
- Institutions should look for:
 - Vendors that cannot meet demands of the contract, or could go out of business during the life of the contract
 - Risk of duplication
 - Finding the Data Owners for shared data
- This requires analysis of and by many areas:
 - Privacy and Security
 - IT/Data integration
 - Legal and Compliance
 - Accessibility

There are many moving parts with Cloud Services and Data Transfers. Avoiding all the pitfalls is unreasonable for one person or department to do alone.

WSU's Solution: Data Management Committee

Summary of Purpose:

- Represent division with functional users, data assets, and university assessment
- Share business knowledge and new or in-development business practices
- Identify strategic planning data needs
- Establish governance policies and procedures
- Set data and reporting standards
- Manage metadata document and data quality assurance
- Assign security / access to data systems and reports

The DMC is led by Dr. David Wright and made up of Staff and Faculty from a diverse range of areas:

- Academic Affairs
- Admissions
- Financial Aid
- Administration Finance
- Research
- Human Resources
- Representation of functional Users
- ITS
- Information Security
- General Counsel

The Data Management Committee Reports to the Data Trustees. The Data Trustees act as division representation for the data owners and users who access systems. Those Trustees are:

- President
- Academic Affairs
- Administration and Finance
- Research

DMC Cont'd.

The DMC worked to identify the issues associated with third-party data transfer and to find solutions to those identified issues

Problem	DMC Review
Multiple points of contact to review an agreement	Single point of contact for all vetting
Overlap in services and agreements drive duplication	Opportunity to learn about already-existing campus services that may be available to solve the identified problem.
Technological limitations and integrations are identified only after purchase	ITS, MRC and other support services are reviewed prior to purchase, decreasing the risk of logistical issues
Accessibility, information security, compliance and privacy issues are not fully disclosed by the vendor prior to purchase	Dedicated experts for accessibility, information security, compliance and privacy review the solution and provide guidance back to the decision maker
Fly by night vendors lack the resources to support the contract and risk going out of business without notice	DMC reviews the maturity of the organization and can identify warning signs of companies unable to meet the needs of the agreement.
Data ownership issues lead to major delays or inability to use the system as intended	The DMC, as the University's general data owner, can help drive direct communication with the vendor prior to purchase to ensure all issues are taken care of as appropriate

The DMC Review Process



1. Requestor emails datatransferreview@wichita.edu
2. DMC sends two documents:
 1. A survey to the requestor, to understand how you envision the usage of the product to provide context and understanding
 2. A survey directly to the vendor to understand the vendor's capabilities. If they have certification, we verify those certifications are accurate
3. The information is provided to the DMC for review
4. Requestor may be asked to come to a scheduled DMC meeting to provide additional information / context about the proposed program
5. DMC will make a recommendation to the requestor regarding the safety, security, functionality, and compliance status of the proposed solution

The DMC Review Process: What We Have Learned

- Things are not always what they seem to be...
- Review approximately 20 services over the past 6 months and have identified:
 - Vendors overstating their capabilities
 - Lack of accessibility functionality
 - Implementation issues
 - Significant security and privacy concerns
 - Duplicative services
- By doing this, the DMC has saved departments at least \$11,000
- Departments have withdrawn their requests due to identified significant security and privacy concerns.
 - The DMC's goal is to help these requestors find comparable software with less security risk

Nothing is perfect

No process is perfect to start – the DMC continues to monitor the process and make modifications based upon reported issues:

Problem	Resolution
The process was overall too slow to meet the needs of the organization	Increased the number of DMC meetings to respond to shorter timeframes and setup email voting for low risk/impact applications
Communication between requestor and internal customer was delayed or slow to respond	Increased the number of people that can respond to DMC request by two, with established processes for next steps and templates for response
No feedback loop for requestors	Established post-process survey to better monitor and identify pain points in the process
No Website for the process	[In Process] – Working with MRC to build a website

What can you do?

1. Use the DMC process
- 2. Reach out as soon as you can – even if you are not sure if you will buy the service!**
 1. On average, vendors take a week or more to respond to vendor surveys
 2. If issues are identified, those take time to vet and resolve with the vendor (e.g., contract changes, corrective actions, etc.)
3. Tell the DMC about your experience and help us identify points of improvement
4. Share with your colleagues the need for the DMC review process

Point of Escalation

Point of Escalation for the DMC is:

Dr. David Wright

Contact information for Dr. Wright:

David.Wright@wichita.edu

(316) 978-7157

Please Contact the DMC at:

Datatrasferreview@wichita.edu



International Travel

International Travel in 2022

- All travel, regardless of designation, has a certain level of inherent risk:
 - Crime
 - Terrorism
 - Civil Unrest
 - Health
 - Natural Disaster
 - Government Relations
- Governing Entities
 - U.S. Department of State
 - Centers for Disease Control
 - U.S. Embassies / Consulates
 - Insurers
 - Travel Providers

- In May 2022, the Kansas Board of Regents adopted a variety of security-related policies, **including one related to international travel**
 - Recognition that international travel creates a risk to information security and/or technology
 - Requires each institution to develop policies, processes and procedures addressing and mitigating the following risks:
 - Individual risk (personal safety, security of all carried property)
 - Informational risk (theft of research data / IP through cyber, physical, and other methods)
 - Institutional risk (harm to the university's employees, students, and reputation)

Goals

- Reinforce the University's commitment to academic freedom and the ability of our students, faculty and staff to communicate, exchange ideas, and collaborate with others around the world
- Ensure the health and safety of travelers, data, information, and the institution
- Review all international travel for safety, security and regulatory compliance
- Follow all applicable laws, rules, regulations, and policies
- Prevent loss of grants and external funding
- Ensure protection of data under contractual provisions
- Create a seamless review process while still gathering all critical information

Working Towards Improvement

We have identified problems in the current international travel request process:

Problem	Resolution
Multiple departments and colleges have duplicated the form and broken links to the Wichita.edu website	[In Progress] – Requesting website owners link to the official travel website on Wichita.edu and not duplicate
The process is of a lower maturity due to limitations of technology, workflow and process.	[In Progress] – ITS is working to implement a workflow solution to help us streamline the form and the approval process [In Progress] – Review process to find ways to optimize [In Progress] – Reviewing approval process to find ways to optimize and ensuring we have all proper parties

Also hoping to establish a general email inbox for these requests...stay tuned!

What Can You Do?

- Once you know that you will travel, please complete the international travel request form as soon as possible – The less time we have, the less options we have available to you
- Please be patient with us – We are working on your behalf to get you on the road. With the rapid changes in laws and situation specific issues we will have challenges
- This process is not perfect – We need your help with feedback, and we will review, listen and act on it where possible