# 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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# Document History/Revisions

Version	Date	Summary of Changes	Author/Editor
1.0	10/21/2018	Initial draft by	Initial Working
			Committee

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# **Key Points**

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

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## Context

Institutional data is a strategic asset of University of South Florida System (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 System, 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

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- USF Regulation 2.0021 Student Records
- USF Regulation 10.017 Limited-Access Personnel Records

## Scope

Information Governance is an organization-wide team effort towards defining processes, roles, policies, standards 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 availability, integrity, security, storage, archiving/deletion 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 operation information governance at USF

The University of South Florida System 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

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Athletics

## Data currently Out-of-scope include:

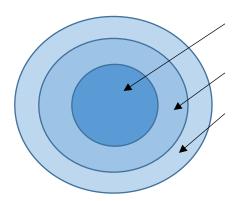
- USF Clinical Data
- IRB requests Data generated and/or accessed for research purposes
- Research computing
- Direct Support Organizations
- Donor Information

## 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.

- 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 content 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 a few or suite of applications, and by business processes supported by those suites of applications. This is not master data as it doesn't link any data across critical business processes or applications.
- 3. **Single-application or single-use data** Like application suite data, but used only within a single business application and by very few end users (or only one).

The Information Governance program will be developed in a <u>graduated</u> fashion starting with the innermost 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 <a href="Initial Working Committee">Initial Working Committee</a> 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 System 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

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## **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 Affairs

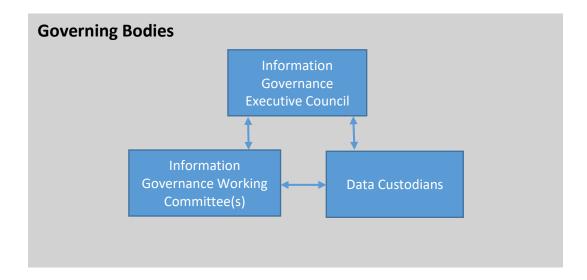
## Initial Charter Working Committee Membership

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

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

## **Governing Bodies**

The Information Governance Program is governed by three distinct governing bodies: the Information Governance Executive Council, the Information Governance Working Committee, 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.



#### **Information Governance Executive Council**

The Information Governance Council consists of senior campus leaders who provide executive level guidance to the Information Governance Program. Their responsibilities (refer <u>Addendum B</u>) 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 Committee'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

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- General Counsel
- Vice Provost Strategic Planning, Performance, & Accountability
- Ex Officio (as needed) Communications & Marketing, Research, etc.

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

- The group will meet as needed.
- Decisions will be made per the Decision Matrix (<u>Addendum C</u>) and the associated working mechanisms.
- Formal decisions on policy will be communicated to the Data Owner Groups and the Information Governance Working Committee(s)

#### **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. The primary focus is on enabling data-driven decision-making within the scope of the Information Governance Program. Responsibilities (refer <u>Addendum B</u>) include:

- Draft and recommend standards, practices and policies to the Information Governance 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

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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:

- The group will meet bi-weekly at minimum
- A quorum is met if three quarters of the group are present
- Formal recommendations to the Executive Council and/or updates to the Information Governance Program Technical Articles need to be ratified by a quorum
- Minutes will be taken for each meeting and will be approved at the next meeting

#### **Data Custodians**

The Data Custodians comprise the entire group of formally identified university data owners who have policy-level managerial responsibility for data within their functional areas, along with a select group of information technology managers. The primary focus is on compliance and security issues.

There are two types of Data Custodians: *Business Custodians* and *Technical Custodians*.

**Business Data Custodians** are university officials having direct operational-level responsibility for the management of one or more types of data. They are charged with providing authorization for access to institutional data.

Their responsibilities include:

Authorizing access to institutional data

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- Data Classification determining the levels of classification of data (Restricted, Sensitive, Public) and monitoring access to those classifications.
   Work with the Chief Information Security Officer (CISO) and the Chief Data Officer (CDO) to develop access criteria and guidelines for each classification
- Ensure 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

The membership of the Data Custodian Group(s) are 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 E of this document.

**Technical Data Custodians** are information technology administrators responsible for the management of systems and servers which collect, store and provide access to institutional data.

Their responsibilities include:

- Implementing all data management policies established by the Data Stewards and Custodians
- Managing access to data as determined by Data Custodians
- Maintaining a physical environment for the safe handling of data that meets all regulatory requirements, disaster recovery and business continuity requirements and data protection policy requirements set forth by the Data Stewards and Custodians.

Data Custodian Group(s) operations are as follows:

The group will meet every other month at minimum.

#### ADDFNDUM 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)

## ADDENDUM B: Roles & Responsibilities Model

The RACI Model below describes the roles and responsibilities of the various members of the Information Governance Program.

#### **RACI Model**

## Responsible

- •"The doer"
- •Those who are assigned to do the work
- Person who completes a particular process step or leads the people who do
- Position working on the activity & responsible for implementation

## **Accountable**

- •"The buck stops here"
- The person who makes the final decision and has the ultimate ownership
- Person who is held accountable by top management for implementation
- Position with Yes / No authority

## **Consulted**

- •"In the loop"
- Person whose advice is sought before a final decision is made and / or implementation takes place
- Position involved prior to decisions or action
- •Two-way communication

## **Informed**

- •"Keep in the picture"
- Those who are notified once a final decision has been made or after implementation takes place
- Position who must be informed that a decision or action has been taken
- •Informed after and only one-way communication

## **Information Governance Program RACI Matrix**

(R = Responsible A = Accountable C = Consulted I = Informed)

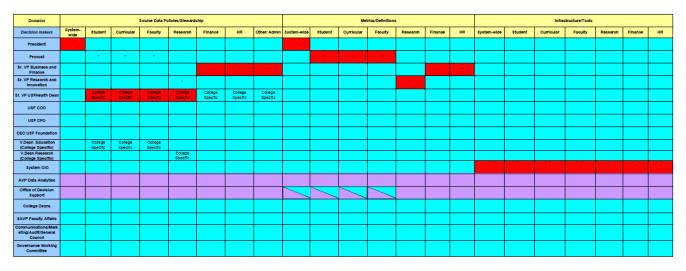
Domains	IG Executive Sponsors	IG Executive Committee	IG Working Committee	Business Data Custodians	Technical Data Custodians	Data Consumers
Establish and Approve Program Charter	А	R	ı	ı	ı	I
Define Roles & Responsibilities	А	R	I	ı	I	1
Approve and Prioritize Projects	I	A/R	I	I	I	I
Determine and Recommend Resourcing	I	A/R	I	I	I	I
Authorize Budget	Α	R	I	I	1	I
Establish and Maintain Policies	I	Α	R	I	I	I
Approve Policies	Α	R	1	1	1	1
Establish and Maintain Procedures & Standards	I	Α	R	I	I	I
Establish and Operate Data Quality Review Process	I	А	R	I	I	I
Plan and Operate Data Quality Initiatives	I	I	А	R/I	R/I	I
Create and Maintain Business Data Dictionary	I	I	Α	R/I	I	I
Establish and Communicate Standards for Data Access and Use	I	I	А	R/I	R/I	I
Enforce and Communicate Standards for Data Access and Use	I	I	А	R/I	R/I	I
Determine Infrastructure and Technology to support Program	I	I	Α	I	R	I

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# ADDENDUM C: Sample Decision Matrix

(Note: This is an unapproved <u>sample only</u>. It also does not include all the domains or roles within <u>scope</u> of this program.)

IT Governance Decision Matrix - Draft

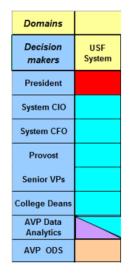


responsible for synthesting inputs to the desiction makers
desiction trades under one per actions.
provides input to desiction.

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# ADDENDUM D: Sample Decision Making Mechanism

(Note: This is an unapproved sample only.)





#### Scope - Major Decisions Addressed

- · Defining system of record
- · Enforcing policies data capture and enrichment, data purge
- · Defining and enforcing data quality measures and tolerance thresholds
- · Business data relationships and mapping
- Access approvals
- Identification of data stewards

#### Mechanism

- Decision Forum: Senior VPs will make the final decision at the recurring Information Governance Executive Council meetings, using appropriate evaluation criteria
- Input Forum: Information Governance Working Committee meetings.
- Trigger: Regularly scheduled Information Governance Working Committee. Business cases to be presented.
- Sponsor: Executive Sponsor of each major project or initiative

#### Metrics

Success measures determined on a case by case basis

#### Compliance

- The Information Governance Working Committee(s) will ensure compliance with the guidelines and policies enforced by Information Governance Executive Committee
- Exception process available as needed
- Communication process and strategy

## ADDENDUM E: Data Owners Membership by Data Type - Samples

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

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

Ex officio: GC, Audit, IT, Health, Branch Campuses, DEIO, etc., as needed.

#### Curricular

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

Ex officio: GC, Audit, IT, Health, Branch Campuses, DEIO, etc., as needed.

#### **Faculty**

- Vice Provost, Faculty
- Associate Vice President Office of Decision Support

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- Vice President Administrative Services
- Research & Innovation, Program Director, USF Faculty Honors, Prizes and Awards
- Dean of the Library
- Institutional Effectiveness Representative
- USF Health Representative
- USF System Data Administrator
- USF World

Ex officio: GC, Audit, IT, Health, Branch Campuses, DEIO, etc., as needed.

Additional Work Groups to consider as the Information Governance Program develops:

- Financial
- Space & Facilities
- Human Resources
- Operational Technical
- Research Financial & Commercialization
- Athletics