Privacy Conundrums in Higher Education: Corralling Squirrels in an Academic Environment

Sarah Morrow, CIPP/US, GISP
Chief Privacy Officer

Jennifer Stewart, CIPP/IT
Privacy Coordinator

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Show of Hands

How many of you have a multi-faceted company to protect without an overall single industry to which you adhere and multiple regulations to which you must comply?
Talk about a large diverse environment

– Multiple buildings, multiple locations
  • 24 Campuses, 26 Colleges
  • Distributed environment
And...
And...
and...you get the picture...
The Forest’s Laws

- Federal Regulations
- State Regulations
- Military Regulations
- International Regulations
- Industry Standards
The Burrow’s Laws

• Academic Freedom
• Intellectual Property
• Institutional Policy
• Institutional Practices
• Open Environment
• Students and Faculty come first
History

• 1855 Land Grant
• Commonwealth affiliated
• Students identified by SSN
• PO created in 2004
• Policy disseminated simultaneously
  – Data Stewards
  – Faculty/staff/student population
  – Approval to use and store
Organizational Structure

Corporate Controller

Risk Management

- Privacy
- Contracts
- Claims
- Insurance
Show of Hands – Privacy Structure

Where is the Privacy Office in your organization? What part do you play in the forest?
New Chief Privacy Squirrel

• Hired in 2009
  – No transition period
  – Not from Higher Ed

• Initial Trials
  – Whack-a-mole (or squirrel in this case)
  – Squirrel identification
  – Office visibility
The Three P’s

• Policy, Procedure and Practice
  – If there isn’t a policy against it I can do what I please
  – We’ve always done it this way
  – Taking the Higher Road because it’s the right thing to do
Squirrels Working Together

• Identity and Access Management
  – EDUCAUSE & Internet 2 for cloud collaboration
  – Federated Identities

• Export?
  – Faculty Abroad
  – Students
  – ‘Gifting’

• Research – Grants
  – Human Subject – NIH
  – Applied Research Lab - DOD
Incident Response

- Investigation
- Security → Privacy

Discovery

- Addresses
- FAQs
- Mailing

Procedure

- Costs (unit level)
  - Forensics/Data Mining
  - Notification Services

Accountability

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What to do?

• Initiate & Champion Cultural Change
  – Relationships are the key
  – Involve people
  – Reduce exposure
  – Partner for change
    • IAM
    • SOS
    • OPP
    • UHS
    • MSHMC
How to do it

• Raising Awareness
  – Road Trips!
  – Classroom training
    • HRDC
    • Private excursions
    • Guest lecturing
    • On-line modules
  – Internal venues
  – Privacy Summit 2013
Help at Last

• A Data Classification Scheme

• A Governance, Compliance, and Risk analysis tool (GRC)
GRC Tool

• Vendor search
• Evaluation process
• Utilization of tool
• Lessons learned

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Show of Hands

Currently using a GRC tool?
Take Aways

• Patience
• Communication
• Acceptance
• Assertiveness
• Awareness
QUESTIONS?

Sarah Morrow
  – sdm24@psu.edu
  – (814)863-3049

Jennifer (Jenn) Stewart
  – jas72@psu.edu
  – (814)863-7820

Privacy@psu.edu
www.psu.edu/Privacy