The Task Force Reviewing and Recommending Comment to the Proposed Policy on Stewardship of Electronic Information
David Teitel, MD, Chair

December 1, 2006

Deborah Greenspan, DSc, BDS
Chair, UCSF Academic Senate
Office of the Academic Senate, Box 0764

Dear Chair Greenspan,

The Task Force Reviewing and Recommending Comment to the Proposed Policy on Stewardship of Electronic Information, consisting of one member from the Committee on Library (to serve as Chair), one member from the Committee on Educational Policy, one member from the Committee on Academic Planning and Budget, one Member from the Clinical Affairs, the UCSF UCITT Representative, and the OAASIS Director of Enterprise Information Security, corresponded over email to review these recommendations and to suggest a possible response from the San Francisco Division. An addendum, prepared by Enterprise Information Security, gives an overview of the UCOP Stewardship Policy and is attached here.

1. The concept of endorsing practices that uphold the principles of privacy and confidentiality, integrity and timely access to information is laudable, and it is also essential to protect electronic resources, but the policy statement continues with “All members of the University community are accountable for compliance.” Members may be accountable for their own actions but it is often outside their abilities to ensure compliance. Many entities on campus, while ready to comply with regulations such as HIPAA, are still without the necessary resources to achieve that compliance. It is unacceptable to produce a document requiring member accountability and not give the members the ability to comply. There is nothing in the document which addresses this critical issue. It should be stated that the University and/or campuses must ensure that the members have the resources to achieve compliance, and that the members must institute the appropriate measures when given those resources.

2. There is no discussion about the interaction between Administration and Academic enterprises, and, in the case of health science campuses, Clinical enterprises, to ensure adequate sharing and protection of information. Coordinated activities across these enterprises should be encouraged at the University level. There is no single “secure technical environment” at the campuses, so that integration among them is essential. OAASIS is an example of such an interaction at UCSF.

3. Risk reduction should be achieved by measures standardized across the University, measures which should be re-evaluated and disseminated on a well-defined, regular basis. For example,
minimum specific locking mechanisms and their maintenance for University laptop and other portable devices could be defined across campuses, to ensure that there is a minimum risk reduction achieved at all campuses. Specifying encryption techniques is another example of standardizing risk reduction. Updating access accounts on a defined schedule is another.

4. There is no discussion as to the oversight of the stewardship effort. Without knowledge of all elements of electronic information storage and utilization down to the individual user, how can any department or unit ensure compliance? The document should present a clear algorithm to define the scope of electronic information at each campus prior to requiring that some body function as its steward.

5. The document puts enormous responsibility on the individual campuses to undertake the entire effort, and only demands that the University writes this document. Further, there is a great deal of variation in the resources (human, technology, financial, knowledge) across the specific institutions that this document will cover and for some institutions this may be a minor burden whereas for many of the institutions this require a significant expenditure in resources to support compliance with this policy. This is likely to result in a spotty or incomplete application of this policy. The Information Technology Leadership Council could have resources to offer far greater support of the individual campuses activities, to minimize duplication of effort.

6. Lastly, this policy does not address the disparities between low level and high level risk for electronic information and sets too high of expectations for information that carries a low/no level risk.

The Task Force thanks you for the opportunity to review and comment on this report. Should you have any questions, please do not hesitate to ask.

Sincerely,

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Task Force Membership
David Teitel, MD, Committee on Library, Chair of the Task Force
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Steven Cheung, MD, Academic Planning and Budget
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