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Information System Activity Review Policy

Policy #: 4000-017

Version #: 2.0

Approved By: Jillian Balow, Superintendent, State of Wyoming Department of Education

Effective Date: May 1, 2016

Purpose:
The purpose of this policy is to regularly review records of information system activity, such as audit logs, access reports, and security incident tracking reports.

Scope:
This policy applies to all WDE workforce members including, but not limited to full-time employees, part-time employees, trainees, volunteers, contractors, temporary workers, and anyone else granted access to student or staff data and sensitive information by WDE. All workforce members are responsible for the security of protected information.

Policy:
WDE will clearly identify all critical systems that process sensitive information. WDE, in collaboration with the Department of Enterprise Technology Services (ETS), will implement security procedures to regularly review the records of information system activity on all such critical systems that process sensitive information.

The information that will be maintained in audit logs and access reports including security incident tracking reports must include as much as possible, as reasonable and appropriate:

Responsibilities:
The WDE Information Security Officer (ISO) will clearly identify:

- The systems that must be reviewed
- The information on these systems that must be reviewed
- The types of access reports that are to be generated
- The security incident tracking reports that are to be generated to analyze security violations
- The individual(s) responsible for reviewing all logs and reports

When determining the responsibility for information review, a separation of roles should be considered between the person(s) undertaking the review and those whose activities are being monitored.

Compliance:

Failure to comply with this or any other security policy will result in disciplinary actions as per HR Policy. Legal actions also may be taken for violations of applicable regulations and standards such as state and federal rules to include the Family Educational Rights and Privacy Act (FERPA).
Procedure(s): Incident Response Plan

Form(s): None

References:
- The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99);
http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html

- State of Wyoming, Department of Enterprise Technology Services, 9400-P167: Information Technology Resource Monitoring
http://ets.wyo.gov/resources/policies-and-standards

- State of Wyoming, Department of Enterprise Technology Services, 9400-P173: Logical Access Controls on IT Resources
http://ets.wyo.gov/resources/policies-and-standards

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