

OLD DOMINION UNIVERSITY University Policy

Policy #3509 SOLUTIONS DISCOVERY SOFTWARE DECISION ANALYSIS POLICY

Responsible Oversight Executive:

Vice President for <u>Digital</u> <u>TransformationAdministration and Finance</u>

Date of Current Revision or Creation:

A. PURPOSE

The purpose of this policy is to ensure that software-based technologies, applications and services are thoroughly reviewed, meet University information technology requirements, are compatible with existing technology standards and services, and are aligned with information technology security regulations and associated business requirements priorities, without introducing unnecessary service interruptions or other risks to the efficient operation of business at the University.

B. AUTHORITY

<u>Code of Virginia Section 23.1-1301, as amended</u>, grants authority to the Board of Visitors to make rules and policies concerning the institution. Section 7.01(a)(6) of the <u>Board of Visitors Bylaws</u> grants authority to the President to implement the policies and procedures of the Board relating to University operations.

<u>Code of Virginia Sections 23.1-1000-1028, as amended</u>, Restructured Higher Education Financial and Administrative Operations Act

C. DEFINITIONS

Data Compliance Owners — As defined in Information Technology Services Standard 01.2.0 IT Security Roles & Responsibilities, University employees (typically at the level of Registrar or Unit LeaderDirector) who oversee data management functions related to the capture, maintenance, and dissemination of data for a particular operational area. They are responsible for decisions about the usage of institutional data under their purview. Data compliance owners understand the compliance requirements for their data, designate the compliance level of their data, and approve access to their data. University Data Compliance Owners oversee compliance for data that is shared or leveraged across the Univrsity, such as Human Resources, Finance, Financial Aid, and Student FERPA data. Departmental Data Compliance Owners oversee the dta that is specific to the departmental application or system that is not overseen by one or more of the University Data Compliance Owners. <u>Project Management Office (PMO)</u> - A strategic functional unit within the Office of Information Technology Services (ITS) that promotes and advances project management principles and services for Information Technology (IT) projects at Old Dominion University.

<u>Services</u> – Professional services to include consulting, designing, organizing, and managing <u>University environments to include access to University data, to assist or do work on behalf of</u> <u>University employees. Consultation to departments on security aspects related to potential</u> <u>software purchases, ensuring alignment with our overall security objectives.</u>

<u>Software Technologies</u>, and <u>Applications</u> and <u>Services</u> - Computer programs or a group of computer programs and related data that <u>process</u>, <u>store</u>, <u>or access University data</u>, operate on or interact with the University systems and information technology resources. These include, but are not limited to, system software, application software, programming software, <u>whether delivered</u> as software as a service (cloud), hosted, or on-premises installed on ODU systems software as a service delivery model, servers and utilities.

System Compliance Owner – As defined in Information Technology Services Standard 01.2.0 IT Security Roles & Responsibilities, a Mmanager or departmental head responsible for operation and maintenance of a University IT system or <u>overseeingoversight of</u> hosted systems under their purview. System Compliance Owners are responsible for the overall compliance and security of their system.

D. SCOPE

This policy applies to all employees and employees of affiliated organizations who are paid through the University in academic and administrative units who procure software technologies or solutions that integrate or access University systems or University data. Employees include all staff, administrators, faculty, full- or part-time, and classified or non-classified persons who are paid by the University. Affiliated organizations are separate entities that exist for the benefit of the University through an operating agreement and include the Foundations, the Community Development Corporation, and the Alumni Association.

This policy applies to all software technologies, applications, and services, including single quantity, open-source, commercially available or independently developed software, that are determined to meet one or more of the following criteria for review, regardless of who initiates the acquisition or the origin of the funding source:

- requires the use of University IT systems and resources, with exceptions as noted in ITS Guidelines;
- requires on-going maintenance by ITS;
- collects, stores, displays, or exports personally identifying data, non-public personal or financial information, protected health information, or student records, or will store or manage data that is subject to legal controls (Ex. FERPA, HIPAA) to include data classifications 1 through 4 per Information Technology Services Standard 02.3.0 Data Administration & Classification;
- interfaces with an existing enterprise system application, such as MIDAS, Banner, course management system, etc.; or
- has implications for physical safety.

Note: Anyone who is uncertain about whether a planned acquisition or development of software technology, application, or service is subject to this policy should contact ITS Risk and Compliance.

The Solutions Discovery Analysis process, in collaboration between the requesting department, Procurement, and ITS, is one way to apply due care in expanding adoption of information security reviews. In cases where systems are purchased prior to completing a solutions security review or system risk assessment, it will remain the responsibility of the requesting department to initiate and complete the review in collaboration with ITS Risk and Compliance.

E. POLICY STATEMENT

Software technologies, applications and services are to be implemented in ways that contribute to the effectiveness and efficiency of the institution and promote compliance with University, <u>State and Federal</u> standards. Prior to procurement of any new software technologies, applications, or services as defined within the scope of this policy, the System <u>Compliance</u> Owner will initiate with Information Technology Services (ITS) an evaluation to assess integration requirements with existing University services, systems and standards, and operational support requirements. The primary goals are determination of integration challenges or coordination needs, information gathering for initiating an IT project, assistance in assessment of redundant services that may be leveraged, assistance with maintenance and cost analysis when appropriate, fostering appropriate dialogue among various stakeholders and operating units, and resource planning. Additional benefits include documentation of the specific data that are involved, gaining Data <u>Compliance</u> Owner approval for use of the data<u>or access</u>, facilitating the proper contract addendum for sharing the data, and supporting identity and access considerations according to ODU IT security standards.

Departments and administrative units contribute to and share responsibility for the deployment of software technologies, applications and services. Specifically, they are responsible for:

- gathering information on software technologies, applications and services;
- initiating a <u>Solutions Discoverysoftware decision aAnalysis with the ITS PMO</u>-prior to the procurement;
- understanding information security roles and responsibilities;
- <u>following</u>supporting University standards and compliance; <u>and</u>
- conducting ongoing maintenance; and
- managing cost of ownership.

The ITS Project Management Office is responsible for (i) accepting and tracking requests for reviews, and (ii) coordinating timely responses to the departmental or administrative units, and (iii) requesting information on software technologies, applications, and services.

ITS <u>Risk and Compliance</u> is responsible for reviewing submissions and sharing findings with departments and appropriate administrative units. The review will include:

- an analysis of compliance with Federal and State regulations and University policy;
- a technical review, including a security review and an integration review when appropriate; and
- ongoing maintenance and cost of ownership review, when appropriate.

ITS and the requesting department will use the following standards and guidelines for reviewing and making recommendations:

- discovery of business need, workflows, and processes;
- review of solution options within existing IT environment;
- review of external solution options;
- compatibility with the University's computing and network environments;
- compliance with the University's IT standards and <u>Solutions Discovery oftware Decision</u> Analysis and System Risk Analysis Guideline;
- suitability based on <u>available solutionsneeds assessment;</u>
- licensing compliance for software purchase;
- hardware and software that can be efficiently supported; and
- availability of sufficient University resources (including initial and recurring costs), and-
- <u>ensuring data access is approved by appropriate Data Compliance Owners.</u>

The outcome of the review will be an analysis of the technology <u>or service</u>'s ability to be compliant with and successful in the University's IT environment. If applicable, recommendations will be made to prevent, <u>or</u> mitigate, <u>or accept</u> risks. Solutionftware acquisitions that <u>aredo</u> not <u>aligned</u> <u>withmeet</u> ITS recommendations will not be supported without approval of the requesting department's Vice President <u>or appropriate stakeholder</u>.

F. PROCEDURES

The requesting department applies this policy for the Information Technology software, system, or service planned for implementation at Old Dominion University according to the criteria established within this policy.

- 1. Departments considering a planned acquisition or development of software technology, application, or service is subject to this policy and should contact IT<u>S</u> Project Management Office who will initiate the Solutions Discovery Analysis process.
- The requesting department gathers information about the <u>solutionsoftware</u> and submits an <u>ITS Solutions DiscoverySoftware Decision Analysis Request</u> to ITS to assist in the data collection. Other information needed will consist of technical documentation, hardware requirements, vendor practices, security, consulting, etc. ITS staff will be available to consult upon request. Early planning is strongly encouraged in order to avoid unnecessary delays.
- 3. ITS <u>Risk and Compliance</u> assesses the information with technical support staff and/or the vendor for further clarification as needed on specific items on the review document. The time required to complete a review can vary based on the complexity of the system and the timing in the academic and budget cycles of the University.
- Following the assessment, ITS provides a summary of findings, including whether contract protections are needed via use of an Addendum Form, whether further architectural review is needed, whether an IT project is needed, and data <u>compliance</u> ownership and responsibilities.
- 5. The departmental System <u>Compliance</u> Owner for the requested system will sign-off on the ITS findings, acknowledging security responsibilities as the System <u>Compliance</u> Owner, and when ODU data is involved, the Data <u>Compliance</u> Owner(s) will sign off for approval for the use of the data <u>as well as other designated roles such as system administrator or application administrator when warranted</u>.

The software decision analysis process, in collaboration among the request department, Procurement and ITS, is one way to apply due care in expanding adoption of information security reviews. In cases where systems are purchased prior to completing a software security review or system risk assessment, other controls are in place that serve to lower risks until such review is completed. It remains the responsibility of the requesting department to initiate and complete the appropriate review, as required by this policy.

Questions regarding this policy should be directed to the Project Management Office in ITS <u>Risk</u> and Compliane Office via at 757.683.3189 or by email at itsriskandcompliance@odu.edu.

G. RECORDS RETENTION

Applicable records must be retained and then destroyed in accordance with the <u>Commonwealth's</u> <u>Records Retention Schedules</u>.

H. RESPONSIBLE OFFICER

Associate Vice President and CIO, Information Technology Services

I. RELATED INFORMATION

The deployment of information technology applications must adhere to all applicable University Policies as noted below. For the Standards associated with University Policies, see also: https://www.odu.edu/about/policiesandprocedures/computing

ITS Computing Policies and Standards University Policy 3500 - Policy on the Use of Computing Resources University Policy 3502 - Information Technology Infrastructure, Architecture, and Ongoing Operations Policy University Policy 3504 - Data Administration Policy University Policy 3505 - Information Security Policy University Policy 3508 - Information Technology Project Management Information Technology Services Standard 08.1.0 - Risk Assessment Standard Department of Procurement Services Procurement Manual