

Mary Dickerson, Executive Director, Information Technology Security

Update on MAPP 10.03.06 - Appointments and ISO Certification Program

All colleges and divisions have assigned someone to fill the following roles for their college or division, as required by MAPP 10.03.06, College/Division Responsibilities for Information Technology Resources:

- Information Resource Manager (IRM)
- Technology Manager (TM)
- Information Security Officer (ISO)

All departments must have their own Information Resource Management Plan. Internal Audit will ask for this when they audit a department. Templates are available. Check with your college/division IRM. UIT Security can work with departments one-on-one that need help and answer questions.

The Campus ISO Certification Program has three requirements:

1. Each college/division must officially appoint an ISO (completed).
2. The ISO must attend an ISO Workshop conducted by UIT Security that outlines responsibilities and resources for doing the job.
3. The ISO must meet basic education requirements by doing one of the following:
 - a. Attend a 3-day Information Security Risk Management Foundations Course sponsored by UIT Security **or**
 - b. Hold an ISC2 Certified Information Systems Security Professional (CISSP) certification (UIT is offering free classes to study for the four-hour exam) **or**
 - c. Earn a Masters' Degree in an Information Security related field

Many college/division ISOs have already met all of the requirements for the ISO Certification Program.

College/Division Use of Identity Finder and New Capabilities

UH has a license to use Identity Finder software, which identifies sensitive data found on computers and other electronic devices. The software is setup to search for social security numbers and credit card numbers, though it can be programmed to search for other sensitive data as well, if needed.

All UH computers must be scanned with Identity Finder and action must be taken to remove the sensitive information, delete the file that contains the sensitive information, or store the sensitive information in a secure location (i.e., university server that is password protected). University sensitive information may not be stored on removable (e.g., flash drive) or portable (e.g., laptop) devices or on non-university (e.g., personal home computer) devices. Non-university (personal) sensitive information may not be stored on any university devices at all.

By September 1, 2011, all ISOs will report to UIT Security the status of Identity Finder scanning for their college or division, including the percentage of computers scanned to date and a summary of the results. UIT Security does not need a detailed account of what sensitive data was found but needs to know what percentage of computers were scanned, percent that contained

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sensitive data, and what was done with the sensitive data (i.e., deleted or moved to secure university server).

By December 31, 2011, all UHS computers should be scanned and action should have been taken to remove the sensitive data or move it to a secure location. ISOs will provide an updated report to UIT Security by December 31.

UIT is purchasing a site license to use Identity Finder to scan websites, Sharepoint, and databases. This should be available within the next week or so.

MAPP 10.03.07 – Email Retention

MAPP 10.03.07 requires UH employees to manage their email in order to comply with state and federal law, maintain necessary university records, reduce cost associated with unneeded storage, and apply best practices associated with records retention.

There are three categories of email:

1. Personal email - not related to university business. This email should be deleted.
2. Transitory correspondence – university email that does not have lasting value, such as phone messages, meeting requests, announcements, etc. This email should be deleted when no longer needed.
3. University business records – university email that has operational, legal, fiscal, historical, or other critical importance to the university. This email must be retained according to SAM 03.H.01, Records Retention.

University business records must be:

- Moved to a dedicated department filing system (e.g., server) **or**
- Retained on the email server (e.g., Exchange) in the user's email mailbox

Either way, the records must be easily accessible if needed by the university.

Questions about classification of specific email messages as “university business records” should be directed to the appropriate college/division administrator. Questions about the Records Retention Schedule should be directed to David Ellis, Executive Director of Financial Reporting.

If the Office of General Counsel issues a “legal hold” on documents relating to certain information or for a certain person or department, the legal hold overrides the records retention policies. Employees must retain those documents from that point forward until notified by the General Counsel that the legal hold has been released. There is no obligation to recover or retain documents created prior to the legal hold, unless notified by General Counsel.

All university email users are expected to:

- Regularly check for new messages
- Routinely secure messages that are university business records and where the user is one of the following:
 - The sender/creator **or**
 - The only or main recipient **or**
 - The designated university custodian for that type of information

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- Delete transitory correspondence as soon as usefulness has ended
- Not retain messages longer than required for their respective job purposes. When the need no longer exists, the message should be deleted.

Additional information is at: <http://www.uh.edu/emailretention>

Joan Nelson, Executive Director, Human Resources

ePerformance Update

To date, 3,061 ePerformance documents have been created, of which 1,325 have been completed or are in the process of being completed (approved). Though much progress has been made in recent days, 1,736 documents have not been started yet. HR will start sending reports next week on the documents that have not been started.

By September, employees will have access to calendar year 2011 documents to establish criteria and goals for 2011. Human Resources is working on a few enhancements to ePerformance to make it more user friendly, though all of the enhancements may not be available in the 2011 documents. Some may need to wait until 2012.

The executive templates are finished, which will be completed by executive directors and above. HR will send an email in the next couple of days to employees who need to complete a template. The templates themselves and associated training material will be distributed next week.

Selesta Hodge, Executive Director, Research Services

Sponsored Research Cash Deficits - Accountability and Collection Procedures

Selesta reviewed the reasons for deficit balances on grant cost centers due to non-payment by the sponsor and cost overruns.

Non-payment by the sponsor occurs for a variety of reasons, including:

- Expenses posted to award after final invoice or expiration of letter of credit
- Sponsor not invoiced or not invoiced correctly due to bad setup
- Sponsor invoiced but claims to not receive it
- Sponsor receives invoice after funds have expired
- Sponsor receives invoice but fails to pay due to internal mistakes or misrouting
- Sponsor does not have funds to pay because of reducing or ceasing operations or bankruptcy
- Sponsor rejects work or deliverables, refuses payment
- Sponsor funds withdrawn due to legislation or budget cuts
- Sponsor not responsive

Cost overruns occur due to:

- Lack of monthly reconciliation
- Payroll is not properly managed
- There is a delayed invoice from a subrecipient

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- Late reallocations

The department is responsible to cover the cash deficit in the following situations:

- Delayed invoice due to department action
- Expenses post after the final invoice
- Technical reports were not submitted as required by the grant
- Sponsor rejects work performed by PI

The Division of Research is responsible to cover cash deficits when the deficit is due to:

- Award setup problem
- Invoicing failure not related to department action
- Accounting error

In the following circumstances, cash deficits will be submitted to the UHS Board of Regents for write-off:

- Sponsor is unable to pay the invoice
- Sponsor is unwilling to pay, though the university has met all requirements, and all collection attempts have failed

The Division of Research will do the following to help prevent sponsor non-payment:

- Timely, electronic invoices will be sent to sponsors (90% are electronic now)
- Improved (more frequent) invoice scheduling
- ID points of contact at the sponsor
- Ongoing review of invoices and payments
- Follow-up on late payments
- Coordinated collections

College/divisions/departments are asked to do the following to help prevent cost overruns:

- Monthly reconciliations
- Appropriate termination on payroll assignments
- Follow-up with subrecipients to ensure timely invoices

In addition, the following actions are being implemented to help better manage grant cost centers:

- DOR will reduce grant budgets to the amount of the final invoice to alleviate cost overruns.
- Deadline for all adjustments, when applicable, is 60 days (2 accounting periods) after the grant end date, unless the grant requires faster closeout. Refer to the Notice of Award.
- If cost overruns remain at the time of final invoice, the institution will determine which expenses to move off the award to department IDC (default).
- Revisions of 30-60-90 day tails letters (emailed, consolidated reports). This is currently in process.
- DOR will contact the department 90/60/30 days before the grant ends and 30/60 days after the grant ends to make sure the grant is closed out properly.

Mike Glisson, Controller

Direct Deposit for AP Payments

As previously announced, all employees will be required to receive their Accounts Payable reimbursements by direct deposit, instead of by check, beginning September 1, 2011. This is a cost saving measure to reduce the expense associated with printing and mailing checks.

Beginning September 1, departments should not forward vouchers to Accounts Payable for employee payments until the employee is setup for direct deposit. AP will return vouchers payable to employees that are not setup for direct deposit starting September 1.

If a voucher is created and the department discovers that an employee is not setup for direct deposit, the employee should be asked to enroll themselves for AP direct deposit in PASS. Once enrolled, the department can immediately change the Payment Method on the voucher Payments page to "ACH" (direct deposit) and send the voucher to Accounts Payable.

In order to enroll in AP direct deposit, the employee must first be setup as a vendor in the AP vendor file. To get setup in the AP vendor file, employees must fax a completed UHS Individual Setup Form to Accounts Payable. The form is at: http://www.uh.edu/vendor/vendor_empl.html However, employees who do not receive reimbursements or other payments through AP are not required to self-enroll for AP direct deposit in PASS.

Accounts Payable will encourage non-employee vendors (companies, contactors, non-employee students, etc.) to enroll in ACH direct deposit too, but they must complete a Direct Deposit Authorization Form and fax it to AP. The form is at: http://www.uh.edu/vendor/vendor_nonempl.html Finance and University Information Technology are working on ways to make direct deposit more user friendly for non-employee vendors, such as a self-service vendor portal and email notification of direct deposits.

Vendor Notification for Expiring Copier Leases

Accounts Payable has been given the responsibility of notifying copier vendors in a timely manner that a lease will not be renewed. AP will copy the department when emailing these notices to the vendor.

Travel MAPP Change in Review

Though it is not policy yet, a change has been drafted and is in review for the travel MAPPs that would require all travel meals to be supported by itemized receipts, rather than just relying on per diem as the reimbursement amount. Though travelers are not supposed to claim more per diem than they actually spent, there is no way of knowing what they actually spent without looking at receipts. If this change is approved, departments will be notified.