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ALABAMA STATE UNIVERSITY (ASU)

Office of Technology Services (OTS)

Audit and Accountability Policy

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Document

Document	Audit and Accountability
References	NIST 800-171 Rev2 / CMMC Rev2 Level II
Control	3.3 AUDIT AND ACCOUNTABILITY
Last Approved	
Next Review	

Annual Review and Revision Tracking

Date	Summary of Changes Made	Changes Made By (Name/title)	Version History

Overview

In today's world of regulatory compliance – and for information security best practices – it's essential for universities to configure information systems for baseline auditable events, and to capture and store such events for further analysis as necessary. Information systems – network devices, servers (both virtual and physical stand-alone servers) and the underlying operating systems and applications residing on such servers should capture essential baseline information for auditing purposes.

In accordance with mandated University security requirements set forth and approved by the Board, ASU has established a formal Audit and Accountability (AU) policy. This policy is to be implemented immediately. Additionally, this policy is to be evaluated on an annual basis for ensuring its adequacy and relevancy regarding ASU's needs and goals.

Purpose

This policy is designed to provide ASU with a documented and formalized Audit and Accountability (AU) policy that is to be adhered to and utilized throughout the University at all times. Compliance with the stated policy will ensure the safety and security of the ASU information systems.

Scope

This policy and supporting procedures encompasses all information systems that are owned, operated, maintained, and controlled by ASU and all other information systems, both internally and externally, that interact with these systems.

- Internal information systems are those owned, operated, maintained, and controlled by ASU and include all network devices (firewalls, routers, switches, load balancers, other network devices), servers (both

physical and virtual servers, along with the operating systems and the underlying application(s) that reside on them) and any other information systems deemed in scope.

- External information systems are those owned, operated, maintained, and controlled by any entity other than ASU, but for which such external resources may impact the confidentiality, integrity, and availability (CIA) and overall security of the aforementioned description of "Internal information systems".

Note: While ASU does not have the ability to actually provision, harden, secure, and deploy another organization's information systems, ASU will follow due-diligence and best practices by obtaining all relevant information ensuring that such systems are safe and secure.

Roles and Responsibilities

Implementing and adhering to the University's policies and procedures is a collaborative effort, requiring a true commitment from all personnel, including management, students, and users of information systems, along with vendors, contractors, and other relevant third parties. Additionally, by being aware of one's roles and responsibilities as it pertains to ASU information systems, all relevant parties are helping promote the Confidentiality, Integrity, and Availability (CIA) principles for information security in today's world of growing cybersecurity challenges.

- **Management Commitment:** Responsibilities include providing overall direction, guidance, leadership and support for the entire information systems environment, while also assisting other applicable personnel in their day-to-day operations. The Vice President of Technology Services is to report to other members of the Board on a regular basis regarding all aspects of the University's information systems posture.
- **Personnel:** Responsibilities include adhering to the University's information security policies, procedures, practices, and not undertaking any measures to alter such standards on any ASU information systems. Additionally, end users are to report instances of non-compliance to senior authorities, specifically those by other users. End users – while undertaking day-to-day operations – may also notice issues that could impede the safety and security of the ASU information systems and are to also report such instance immediately to senior authorities.

Policy

ASU is to ensure that all applicable community users adhere to the following policies for purposes of complying with the mandated University security requirements set forth and approved by the board. ASU shall:

- Create and retain system audit logs and records to the extent needed to enable the monitoring, analysis, investigation, and reporting of unlawful or unauthorized system activity.
- Ensure that the actions of individual system users can be uniquely traced to those users, so they can be held accountable for their actions.
- Review and update logged events.
- Alert in the event of an audit logging process failure.
- Correlate audit record review, analysis, and reporting processes for investigation and response to indications of unlawful, unauthorized, suspicious, or unusual activity.
- Provide audit record reduction and report generation to support on-demand analysis and reporting.
- Provide a system capability that compares and synchronizes internal system clocks with an authoritative source to generate time stamps for audit records.

- Protect audit information and audit logging tools from unauthorized access, modification, and deletion.
- Limit management of audit logging functionality to a subset of privileged users.

Compliance Mapping Matrix

The following Matrix is to be completed for purposes of cross-referencing and effectively mapping the basic and derived security requirements with existing information security policies and procedures for ASU.

Basic and Derived Security Requirements	Listing of Applicable POLICY and/or STANDARD OPERATING PROCEDURES (SOP) Documentation	Notes and Comments
NIST SP 800-171 Rev2 3.3.2	User Accountability	
NIST SP 800-171 Rev2 3.3.3	Event Review	
NIST SP 800-171 Rev2 3.3.4	Audit Failure Alerting	
NIST SP 800-171 Rev2 3.3.5	Audit Correlation	
NIST SP 800-171 Rev2 3.3.6	Reduction & Reporting	
NIST SP 800-171 Rev2 3.3.7	Authoritative Time Source	
NIST SP 800-171 Rev2 3.3.9	Audit Management	

References

Related Regulations, Statutes, Policy and/or STANDARD OPERATING PROCEDURES (SOP) Documentation	Notes and Comments
Access Control	
Audit Log procedures	

Responsibility for Policy and Procedures Maintenance

ASU is responsible for ensuring that the aforementioned policy initiatives, and if applicable – the relevant procedures – are kept current as needed for purposes of compliance with mandated University security requirements set forth and approved by the Board.

Definitions

Personnel – All users of all information systems that are the property of ASU. Specifically, it includes:

- All faculty, staff and student workers, whether employed on a full-time or part-time basis by ASU.
- All contractors and third parties that work on behalf of and are paid directly by ASU.
- All contractors and third parties that work on behalf of ASU but are paid directly by an alternate employer.
- All employees of partners and clients of ASU that access ASU’s non-public information systems.
- All volunteers and alumni that serve on behalf of ASU.

- All students attending ASU.

Violation of Policy

Violation of any of the constraints of these policies or procedures will be considered a security breach and depending on the nature of the violation, various sanctions will be taken:

1. First Incident of a minor breach will result in verbal reprimand by the policy owner as outlined in the Personnel Disciplinary Policy found in the ASU Personnel Handbook. If the offender already has a verbal reprimand for the same infraction, the incident will be remanded to Human Resources as outlined below.
2. Multiple minor breaches or a major breach will be remanded to Human Resources and Executive Management for disciplinary action as outlined in the Personnel Disciplinary Policy found in the ASU Personnel Handbook.
3. In the case of a student, the breach will also be remanded to the Dean of Students.

Disclosure

ASU reserves the right to change and modify the aforementioned document at any time and to provide notice to all users in a reasonable and acceptable timeframe and format.

Signature

Name

Title

Date