

State of South Carolina Data Classification Auditing and Monitoring Plan (1.5)



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Revision History

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Background, Purpose, and Scope

Background

The State has established specific agency requirements regarding the classification and analysis of agency data. At a high level, these requirements include, but are not limited to:

1. **Data Inventory** – Agency business process owners (i.e., program area/data owners) should complete an agency Data Inventory
2. **System Classification** – Agency business process owners should formally classify each system of the business process according to the State's *Data Classification Schema*
3. **Security Control Analysis** – Analyze how the Agency protects its systems, identify security control gaps, and create remediation plans

Detailed guidance pertaining to the above requirements is provided in the State's Data Classification and System Control Analysis Procedures document. Agencies should understand and complete the activities within the Data Classification and System Control Analysis Procedures before completing the Agency's Data Classification Auditing and Monitoring Plan (this document).

Purpose

This Auditing and Monitoring Plan will be the official guide to the repeated review of the Agency's Data Inventory, system classification assignments, and remediation progress. This plan is intended for the State of South Carolina and its agencies and institutions to act in accordance with.

Scope

This plan covers the auditing and monitoring activities to be completed by each agency. This plan is to be completed by the appropriate personnel as outlined in the State's Data Classification and System Control Analysis Procedures document. While general State Agency employees are not directly involved in formal data inventory or data classification activities, they **are** responsible for protecting and handling data according to State information security policies.

Content Overview

The following information outlines the main sections included in this plan. A brief description of each section is provided below. Details are provided in the subsequent sections of this document.



Section 1: Auditing Plan

This section summarizes the two recommended methods of regularly auditing the Data Inventory and system classification assignments. A member of the Data Inventory Quality Assurance team will choose one of the two methods to review and confirm the content within the Data Inventory.

References: Data Inventory, Data Inventory Analysis Report, data discovery tool results

Section 2: Monitoring Plan

This section provides guidance on how to regularly monitor the progress on the remediation efforts. The Data Champion is encouraged to compare the previous years' Data Inventory Analysis Reports to measure the Agency's progress.

References: Data Inventory Analysis Report, project management documentation

1 Auditing Plan

Once the Data Inventory Analysis Report has been drafted, the Data Inventory Quality Assurance team should review the report to determine where the sensitive data resides within the Agency. The team will

then can choose one of two methods of auditing a sample of the Data Inventories and corresponding System Control Analysis:

1.1 Manual Review

A member of the Data Inventory Quality Assurance team manually reviews the selected Data Inventory(s) with the business process owner(s) for accuracy. The business process owner is required to facilitate the audit by demonstrating the steps taken. To begin the audit, the member of the Data Inventory Quality Assurance team should thoroughly review the steps the business process owner took to populate the Data Inventory. Secondly, the team member should confirm the System classification assignment.

If the business process owner(s) have successfully completed the Data Inventory, the audit can be concluded. If the business process owner(s) have not correctly completed the Data Inventory, the Data Inventory Quality Assurance team should assist the business process owner(s) in completing the Data Inventory correctly.

1.2 Automated Review

In this method, the Data Inventory Quality Assurance team will utilize a data discovery tool to determine the data sets within a system. The team member will take the following steps:

1. Examine the results of the data discovery tool
2. Identify the users who have handled sensitive data
3. Tie those users to the respective business process
4. Include the business process in the audit sample
5. Determine if the corresponding Data Inventory includes the sensitive data discovered

The Data Inventory Quality Assurance team member (and/or appointed delegate) is expected to fully understand the results of the data discovery tool before identifying the users of sensitive data. The team member then compares the data discovery tool results with the data sets within the corresponding Data Inventory to determine if the business process owner has accurately populated the Data Inventory.

If the business process owner(s) have successfully completed the Data Inventory, the audit can be concluded. If the business process owner(s) have not correctly completed the Data Inventory, the Data Inventory Quality Assurance team should assist the business process owner(s) in completing the Data Inventory correctly.

2 Monitoring Plan

On an annual basis, the Data Champion should monitor the progress made on the Data Inventory Analysis Report's "Next Steps for Gap Remediation". The Data Champion is responsible for updating the Data Inventory Analysis Report based on the changes to the Agency's Data Inventories.

3 Appendix

3.1 Roles and Responsibilities

The table below offers an overview of each role required to execute the Data Inventory Auditing and Monitoring Plan.

Role	Auditing and Monitoring Responsibility
Agency Director	<ul style="list-style-type: none"> • Review submitted Data Inventory Analysis Reports and file them for records purposes • Provide oversight and direction upon request from the Data Champion or other stakeholders, such as Business Process Owners, Data Custodians, and/or Information Security personnel
Data Champion (Data Trustee¹)	<ul style="list-style-type: none"> • Draft and maintain the Data Inventory Analysis Report after receiving relevant information from stakeholders, such as Business Process Owners, Data Custodians, and/or Information Security personnel • Review previous versions of the Data Inventory Analysis Report to track the progress of the remediation efforts and next steps listed • Provide oversight and direction upon request from the stakeholders, such as Business Process Owners, Data Custodians, and/or Information Security personnel • Maintain the Data Inventory Analysis Report
Business Process Owner (Data Steward¹)	<ul style="list-style-type: none"> • Assist the Data Inventory Quality Assurance team member with the auditing process • Regularly update the Data Inventory • Provide relevant information to the Data Champion to assist in the creation of the Data Inventory Analysis Report
Data Inventory Quality Assurance Team	<ul style="list-style-type: none"> • Audit a sample of the business processes based on the results of the Data Inventory Analysis Report • Review and standardize the Data Inventories • Determine the sample of business processes to audit

4 References

The following sources were used in the development of the *Data Inventory Analysis Report*:

- *State of South Carolina Data Classification Schema* (September 2013)
- *State of South Carolina Data Classification and System Control Analysis Procedures* (February 2014)
- University Administration Data Access Policy (UNIV 1.50, Formerly ACAF 7.02)

4.1 Document Approval

Document Title		Document Type	Office	Version	Effective Date
Data Classification Auditing and Monitoring Plan		Plan		1.0	
Approval Level	Approver	Position/Title	Signature	Date	
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