NORTH DAKOTA UNIVERSITY SYSTEM

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Core Technology Services

Student Data Privacy Bill of Rights

Project Charter

Project Short Name:	Student Data Privacy Bill of Rights
Business Unit/Program:	Core Technology Services
Project Sponsor:	Jody French
Project Manager:	Angela O'Leary
Version:	1.0
Date:	08/28/2020

Glossary of Acronyms:

Acronym/Abbreviation	Description
AST	Academic Services Training
ASM	Assessment Strategy Model
BI	Business Intelligence
CIO	Chief Information Officer
CS	Campus Solutions
CTS	Core Technology Services
ESC	Executive Steering Committee
ES	Enterprise Services
FIN	Financials
HCM	Human Capital Management
IR	Institution Research
IT	Information Technology
NDCC	North Dakota Century Code
NDUS	North Dakota University System
PII	Personally Identifiable Information
SaaS	Software as a Service
SBHE	State Board of Higher Education
SME	Subject Matter Expert
US	United States

1 PROJECT DESCRIPTION

The SBHE passed policy 503.2 Student Data Privacy Bill of Rights on May 29, 2020. The policy states in summary: The SBHE, the NDUS, and NDUS institutions are committed to responsibly collecting, storing, and using the PPII of students, while protecting student PII from unauthorized access or disclosure. This Policy reflects the reality that students are the owners of their PII and should control access to and distribution of their PII to the greatest extent possible, yet many NDUS programs and technologies require student PII to function for the students' benefit. This Policy outlines student rights related to the privacy and security of their educational and personal data.

Link to the entire policy: [503.2 Student Data Privacy Bill of Rights](#)

CTS is responsible to comply with the new policy by December 2020 and have a process in place for when a student submits a request about PII data, CTS is prepared to respond.

1.1 Project History

CTS developed a team of individuals to identify the basic PII elements that are collected, stored, and shared with vendors and contractors from applications/products that are supported, managed, and maintained by the organization.

1.2 Consistency/Fit with Organization's Mission

This project fits with two of the NDUS's stated goals of the NDUS Strategic Plan 2019-2021:

Goal 1, Objective 2: Provide tools and technologies to help people more easily use networked resources and services, while ensuring security and privacy of the information.

Goal 4, Objective 2: Continually improve communications with all stakeholders.

1.3 Business Need

CTS needs to comply with SBHE policy 503.2 by December 2020.

1. Identify types of student PII elements that are collected, stored, and provided to vendors and contractors
2. Document the data collected by CTS
    a. Capture types of student PII elements for each CTS product
    b. How is the data collected
        i. Required data
        ii. Student provided data
    c. Where it is stored
        i. SaaS/Cloud
            1. US or Non-US based datacenter
        ii. On-Prem
    d. Provide data with external vendors and contractors
3. Develop a customer friendly process for students to request this information
4. Document how and when the data is managed and maintained

1.4   Solution Statement

Establish an internal CTS process that complies with policy 503.2 and encompasses various departments across the organization.

2   PROJECT SCOPE

2.1   Scope Statement

Work with CTS departments who support, manage, and maintain products that collect, store, and provide types of student PII data with vendors and contractors, collect the information, and come up with a process that complies with policy 503.2.

2.2   In Scope:

- Identify types of PII elements:
    - Student's Name (First, M, Last) (direct PII)
    - Mailing addresses (direct PII)
    - Email addresses (direct PII)
    - Phone numbers (direct PII)
    - Emplid (direct PII)
    - SSN (direct PII)
    - DOB (indirect PII)
    - Divers License Number (direct PII)
    - License Plate (direct PII)
    - Parent's Name (direct PII)
    - Bank Information (direct PII)
    - Credit Card Information (direct PII)
    - Photos (direct PII)
- CTS teams and the applications/products they support, manage and, maintain
    - Campus Solutions Team (includes Ancillary Systems)
    - Finance team
    - HCM team
    - AST team
    - Enterprise Services team
    - Security team
    - IR team
- Establish a process the CTS organization can use to respond to student requests regarding the types of PII data that is collected, stored, and shared with vendors and contractors. This process will include communication and collaboration with NDUS campuses to ensure a positive customer service experience for students. CTS will utilize current in house tools, applications, etc. to develop the process.

2.3 Out of Scope

The "In Scope" elements are high level and should be elaborated during the planning phase. However, specifically, the scope of the project does not include:

- Identifying queries and extract files such as 188 and 027 that have the in-scope PII elements listed under each application/product

- Working with the NDUS institutions to identify types of student PII that are collected, stored, and provided to vendors and contractors

- Working with the NDUS institutions in establish their own internal process for student requests

- Addressing number 10 in the 503.2 policy

- Other types of PII that are not listed as "in-scope"

3   BUSINESS ANALYSIS

Business Need/Problem 1: Identify types of student PII that are collected, stored, and provided to vendors and contractors

Objective 1.1: Develop an assessment strategy model (ASM) that will assist the project team in documenting information on products supported by CTS the "in-scope" section of the charter

Measurement 1.1.1: Verify with the project team the model is easy to understand and comprehend

Measurement 1.1.2: The model will serve as the tool needed to capture students PII elements for each of the products CTS supports

Anticipated Benefit(s): The model will provide some consistency and organization when interacting with each of the CTS areas when identifying students PII elements.

Objective 1.2: Schedule an assessment strategy exercises with each of the following teams: Campus Solutions, FIN, HCM, Enterprise Services, Security, IR, AST and go through the ASM to collect the elements needed laid out in the scope section of the charter.

Measurement 1.2.1: Have each of the CTS areas proof the information that was collected during the assessment strategy exercise.

Anticipated Benefit(s): By having each of the CTS areas proof the data that was collected, this will ensure the project team has accurate data to begin adding to the document that will be developed.

Business Need/Problem 2: Document information collected by CTS

Objective 2.1: Create a document that will compile all the data from the assessment strategy exercises and format the information into a comprehensive layout for stakeholders and project team members to understand.

Measurement 2.1.1: Share the document with the CTS areas involved in the project to ensure the format is user friendly (easy to read and comprehend)

Anticipated Benefit(s): The document will serve as a reference point when the team begins to develop a process for when a student submits an inquiry about their PII.

Business Need/Problem 3: Implement a customer friendly process for students to request what PII is collected and shared with vendors and contractors

Objective 3.1: Brainstorm with the team to develop a process that will be customer friendly for student inquiries

Measurement 3.1.1: Generate more than one idea of what "the process" will look like from beginning to end to determine the best approach

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Anticipated Benefit(s): Brainstorming various approaches of what the process will look like is an exercise that challenges the project team to come up with the most feasible, user friendly process that can be developed within the timeline constraints.

Objective 3.2: Design the selected process by utilizing existing tools the CTS project team has access to (e.i: SharePoint, TeamDynamix, PowerBI, Right Answers, etc.)

Measurement 3.2.1: Verify the process in having the internal team initiating a student request and documenting each step along the way using a variety of use cases.

Anticipated Benefit(s): Giving the internal team an opportunity to test the process prior to turning it over to external stakeholders allows the CTS team to address and resolve issues that surface during testing. Having a variety of internal team members designing and testing a new process builds redundancy and knowledge sharing.

Objective 3.3: Test the process to ensure it meets the expected requirements.

Measurement 3.3.1: Invite multiple stakeholders outside of the project team to test the process to ensure it is customer friendly and intuitive.

Anticipated Benefit(s): By providing external stakeholders to test the process, it will ensure and verify all requirements have been met and CTS is complying with SBHE policy 503.2.

Objective 3.4: Implement and communicate the new process with all councils and the CTS organization

Measurement 3.4.1: Demo the new process with the CIO Council and during a monthly ALL Staff meeting.

Anticipated Benefit(s): Sending out various communications and demoing the process will provide awareness with stakeholders and all interested parties.

Business Need/Problem 4: Document the managing and maintaining of data to ensure information provided to the student is current.

Objective 4.1: Meet with the internal CTS team to come up with a plan for the organization and the various departments to keep the data the process is using updated.

Anticipated Benefit(s): Having a plan in place to keep data current provides students with accurate up to date information. Establishing a plan that includes a schedule the entire organization adheres to, will provide consistency and standardization.

4   COST ANALYSIS

The only cost the project anticipates accruing are CTS resource costs. The project will not be purchasing software, hardware, etc. nor bringing in consultants.

5   BUSINESS RISK ANALYSIS

5.1   Risks of Performing the Project:

Risk: Workload of CTS resources in such a short timeframe

Impact: This project will place additional workload on CTS resources

Response: Ensure there is a balance in workload

5.2   Risks of Not Performing the Project:

Risk: Out of compliant with SBHE policy 503.2

Impact: If the project is not completed by December 2020, CTS will not be incompliance with SBHE policy 503.2

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6   RESOURCE ANALYSIS

The planning of this project is estimated to take # weeks. The following identifies the resources required for planning only. It also includes the percentage of time and anticipated hours that will be required from each resource for the planning period.

Table 2: Resource Analysis

Planning Start Date: 07/29/2020	Planning End Date: 08/30/2020
Resource, Role	**Hours Required per week**
O'Leary, Angela- Project Manager	10
French, Jody- Sponsor	2
Quirk, Corey- Enterprise Services. SME	2
Newland, Dan- Endpoint Services. SME	2
McNaughton, Tom- CS SME	2
Miller, Brad- Security SME	2

7   PROJECT AUTHORITY

7.1   Assumptions and Constraints

7.1.1   Assumptions:

Assumptions are factors that, for planning purposes, are true, real, or certain without proof or demonstration.

The project has the following assumptions:

- NDUS institutions are developing their own separate process to comply with policy 503.2
- CTS resources are available to complete the project
- CTS will use current tools to develop a process listed in business need three
- CTS will not procure a software to address the business needs listed in section 3.0
- The new process will begin with the student initiating a request through their campus, not CTS

7.1.2   Constraints:

Constraints are defined as the state, quality, or sense of being restricted to a given course of action or inaction. An applicable restriction or limitation, either internal or external, to the project that will affect the performance of the project or a process.

The project has the following constraints:

- CTS resources are available and dedicated to completing the project by December 2020
- Timeline
- Cost, schedule, scope, and quality are often in conflict during projects. The sponsor elected to prioritize as follows:
    1. Schedule
    2. Scope
    3. Quality

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    4.   Cost

7.2 Authority/Escalation

Authority to proceed with this charter is granted to the Project Manager. The Project Sponsor must approve any diversion from the aforementioned scope which would materially impact the overall scope or incur cost. The project manager has the authority to manage all costs allocated to the planning process.

The Project Manager is authorized to utilize the resources necessary to plan the project based on the information above and will be required to receive sign-off on the project plan prior to execution.

8 APPROVAL

Project Charter Approval

Project Sponsor Name: Action: Approve: ☐ Reject: ☐

Comments:

Project Sponsor Signature: _____*Jody French*_____ Date: __8/28/2020__