

During the course of an audit, Office of the State Auditor staff may uncover potential issues that are outside of the audit objectives. Although the issues may not have been part of the planned objectives, the issues need to be presented to those charged with governance of the organization under audit. Below is such an issue.

THE BOARD OF GOVERNORS SHOULD ASSESS THE AUTHORITY GIVEN TO UNC-GA FOR OVERSIGHT OF INFORMATION TECHNOLOGY SECURITY AT MEMBER INSTITUTIONS

As of August 2015, four of the 17 system campuses had failed to provide the University of North Carolina General Administration (UNC-GA) with information technology (IT) security evaluations due in July 2012.

Gap analyses and risk assessments² were requested from each campus as part of the university's implementation in 2012 of a new IT security framework adopted by the member campuses in partnership with UNC-GA.

Delays in approving and implementing the IT security policies consistent with the IT security framework puts the security of personal information of students, staff and faculty at these universities at risk and the universities at risk for failure to prevent, detect, and respond to IT data breaches.

Under State law,³ UNC-GA derives its authority over member campuses solely through direction from the UNC Board of Governors (Board). UNC-GA officials represent that the Board has not provided them authority to hold campuses accountable for complying with the IT security framework adopted by the member campuses.

The Board should assess whether the authority currently given to UNC-GA related to the oversight of IT adequately protects data throughout the university system.

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² A gap analysis would identify the differences between the new IT security framework and existing campus policies. A risk assessment would describe plans for compliance with the new framework, mitigation of risks identified by the gap analysis, or the use of alternative controls to address security gaps.

³ North Carolina General Statutes 116-11 and 116-14.