Security and Privacy Impact Assessment
SPIA Web Application
User’s Guide
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MODULE 1 - OVERVIEW OF THE SPIA APPLICATION

This training module will provide an overview of the newly developed web application for the Security and Privacy Impact Assessment Program, otherwise known as SPIA.

We will begin by looking at the organizational structure of the SPIA application and the various roles and responsibilities within the application.

A. Key Terminology

Before looking at the individual roles, it is important to understand some key terminology associated with the SPIA Web Application.

An **Asset** is an application or database that will be assessed as part of SPIA because it contains Confidential University Data that a School/Center is responsible for designing, managing, administering or operating.

An **Inventory** is a collection structure for a group of related Assets.

The SPIA Web Application helps Schools and Centers organize and assess their Inventories of Assets. Now, with those terms in mind, let’s discuss the different roles and responsibilities within the SPIA Web Application.

B. Roles & Responsibilities

As you can see from the organizational chart below, **Information Security** and the **Privacy Office** oversee the entire SPIA program for the University – as such they are designated as the **Program Administrators** for the application.

They will have the ability to see all data Inventories and Assets across the University and will receive each School or Center’s annual Inventory submissions and Executive Summaries.

Next, we have **School or Center Administrators**. School/Center Administrators are responsible for the overall coordination of the SPIA program for their designated School or Center.

The School or Center Administrator will create **Departments** or **Units** as subgroups within a School or Center for the purpose of organizing Inventories of Assets.

The School or Center Administrator may also assign **Executive Reviewers**. Executive Reviewers are individuals within a School/Center who have read-only access to the School/Center's
Executive Summary as well as the underlying Inventories and Assets once the School/Center Administrator has saved the Executive Summary as "Final".

The School or Center Administrator will also assign **Inventory Managers** to Departments/Units. Inventory Managers are responsible for creating one or more data Inventories for the Department or Unit.

**Security and Privacy Impact Assessment (SPIA) Web Application**
MODULE 2 – SETTING UP UNITS
School/Center Administrators

The School/Center Administrator is responsible for the overall coordination of the School/Center’s SPIA program.

As a School/Center Administrator, you will have access to all of the information about all of the Assets within your entire School/Center. You may also designate more than one School/Center Administrator for your School or Center to assist you in coordinating the annual SPIA assessment, and they will have the same, equal access to all of the data for all of the Assets within your School/Center.

A. Creation of Units

One of the first tasks for the School/Center Administrator is to create “Units” within the School or Center that will serve to organize the School or Center’s Inventory of Assets. As the School/Center Administrator, you can establish as many Units as necessary and define them in a way that is most appropriate for your School or Center. For example, “Units” may be organized by departments, research groups, or business functions – whatever is most effective for you in managing the Inventories of Assets.

To create a Unit, on the left navigation menu, go to Administration (expand if necessary) and click on “Units and Managers”.

---

[Image of Penn University of Pennsylvania SPIA navigation menu]

- Home
- Find Existing Inventories
- Add an Inventory
- Executive Summary
- Asset Report
- Administration
  - Units and Managers
  - School/Center Administrators
  - Executive Reviewers
  - Resources
You will be presented with the “Units and Managers” page. Click on the green “Add a Unit” button at the top left of the presented screen. The Unit box will be presented for creation. There will be one required field: “Name of Unit”.

Type in the unique name for the Unit you are creating. For example: Research Group A

The related School or Center will already be pre-populated. Please note, however, if you are a School or Center Administrator for more than one School or Center, you will be required to select the School or Center that this Unit applies to from a drop down menu.

Once the required information is entered, you will click the blue “Save” button to save the newly created Unit.
Clicking the blue “Back” button under the "Edit a Unit" heading, will take you to the "Units and Managers" page where you will see a listing of all current Units, including the name of the Unit just added. On this page, you also have the ability to add additional Units following the same process.

B. Editing or Deleting Units

The Units displayed will be for the current fiscal year on the Units and Managers page.

For the current fiscal year only, you may edit or delete existing Units on this page. To edit an existing Unit, click on the blue "Edit" button next to the name of the Unit that you wish to edit.

**Units and Managers**

<table>
<thead>
<tr>
<th>Action</th>
<th>Name*</th>
<th>School/Center</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="image.png" alt="Image" /></td>
<td>OACP - Administration</td>
<td>Audit Compliance and Privacy</td>
</tr>
<tr>
<td><img src="image.png" alt="Image" /></td>
<td>OACP - Compliance</td>
<td>Audit Compliance and Privacy</td>
</tr>
<tr>
<td><img src="image.png" alt="Image" /></td>
<td>OACP - Finance</td>
<td>Audit Compliance and Privacy</td>
</tr>
<tr>
<td><img src="image.png" alt="Image" /></td>
<td>OACP - Internal Audit - IT area</td>
<td>Audit Compliance and Privacy</td>
</tr>
<tr>
<td><img src="image.png" alt="Image" /></td>
<td>OACP - Penn Medicine Audit</td>
<td>Audit Compliance and Privacy</td>
</tr>
<tr>
<td><img src="image.png" alt="Image" /></td>
<td>OACP - Privacy</td>
<td>Audit Compliance and Privacy</td>
</tr>
<tr>
<td><img src="image.png" alt="Image" /></td>
<td>OACP - University Audit</td>
<td>Audit Compliance and Privacy</td>
</tr>
</tbody>
</table>
You will be presented with the "Edit a Unit" page. Make any required changes and click the blue "Save" button.

Clicking the blue “Back” button under the "Edit a Unit" heading, will take you back to your list of Units for the School or Center.

To delete a Unit, select the box to the left of each Unit name that you wish to delete, then click the green "Delete Checked" box under "Units and Managers" heading. Note that you will not be able to delete a Unit that contains existing Inventories. You must first delete the existing Inventories within the Unit and then proceed to delete the Unit. For more information on deleting an inventory, please see the training module entitled "Inventories".

**Units and Managers**

<table>
<thead>
<tr>
<th>Action</th>
<th>Name</th>
<th>School/Center</th>
</tr>
</thead>
<tbody>
<tr>
<td>Edit</td>
<td>OACP - Administration</td>
<td>Audit Compliance and Privacy</td>
</tr>
<tr>
<td>Edit</td>
<td>OACP - Compliance</td>
<td>Audit Compliance and Privacy</td>
</tr>
<tr>
<td>Edit</td>
<td>OACP - Finance</td>
<td>Audit Compliance and Privacy</td>
</tr>
<tr>
<td>Edit</td>
<td>OACP - Internal Audit - IT area</td>
<td>Audit Compliance and Privacy</td>
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<tr>
<td>Edit</td>
<td>OACP - Penn Medicine Audit</td>
<td>Audit Compliance and Privacy</td>
</tr>
<tr>
<td>Edit</td>
<td>OACP - Privacy</td>
<td>Audit Compliance and Privacy</td>
</tr>
<tr>
<td>Edit</td>
<td>OACP - University Audit</td>
<td>Audit Compliance and Privacy</td>
</tr>
</tbody>
</table>

Result page: 1
MODULE 3 - UNIT ADMINISTRATION

A. Assigning Inventory Managers

Another task for the School/Center Administrator is to establish Inventory Managers for the Unit. Inventory Managers have the ability to create and edit Inventories of Assets for the Unit. The School/Center Administrator may assign multiple inventory Managers to a Unit who will be able to view all the Inventories within the Unit.

Inventory Managers also have the ability to assign additional Inventory Managers to the Units to which they have access.

To create an Inventory Manager, on the left navigation menu, go to Administration (expand if necessary), and click on Units and Managers. You will be presented with a list of current Units to which you have access. Select the Unit to which you wish to assign Inventory Managers by clicking the blue "Edit" button next to the Unit name.
The “Edit a Unit” page will be presented. Under "Inventory Managers" heading, click the green "Add an Inventory Manager" button.

**Units and Managers :: Edit a Unit**

**Unit**

- **Name**: OACP - University Audit
- **School/Center**: Audit Compliance and Privacy

The "Add an Inventory Manager" page will appear. In the User box, start typing the person's name, PennID or PennKey for a list of matches from Penn Community. Once the name of the appropriate person is presented, click on the name and then click the blue "Save" button.

**Units and Managers :: Edit a Unit :: Add an Inventory Manager**

**User**

Start typing the person's name, Penn ID or PennKey for a list of matches from Penn Community.
You will then return to the "Edit a Unit" page where you will see a listing of all current Inventory Managers for the Unit – including the name of the Inventory Manager you just added.

On this page, you also have the ability to add additional Inventory Managers or delete existing Inventory Managers. To delete an Inventory Manager, select the box to the left of each Inventory Manager name that you wish to delete, then click the green "Delete Checked" box under the "Inventory Managers" heading (note: you will be given an option to continue or cancel your deletion request).

**Units and Managers :: Edit a Unit**

**Unit**

Name: OACP - University Audit  
School/Center: Audit Compliance and Privacy  
* required

**Inventory Managers**

<table>
<thead>
<tr>
<th>Add an Inventory Manager</th>
<th>Delete Checked</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Result listings: 1-1 of 1

<table>
<thead>
<tr>
<th>User Name</th>
<th>Penn ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Joshua D Beeman</td>
<td></td>
</tr>
</tbody>
</table>

Result page: 1

Clicking the blue Back button (do not use your browser’s back button) under the "Edit a Unit" heading or below the “Inventory Managers” box, will take you to your list of Units for the School or Center where you will be able to establish Inventory Managers for other Units following the same process.
B. Using the Unit or Inventory Manager Search Filter

On the Units and Managers page, you also have the ability to filter or search the School/Center's Units to which you have access by Unit name, School/Center (only if you are assigned to more than one School/Center), Inventory Manager, or fiscal year (only if you have Units created prior to the current fiscal year). To do this, click on "Show Filter" in the upper right corner of the Units and Managers page if the filter options are not yet displayed.

**Units and Managers**

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The "Find Existing Units" filter will be presented and the current fiscal year will be the default. To find Unit(s) to which you have access, type in the full or partial name of the Unit(s) in the Name field and click the blue "Find" button. You will be presented with all Unit matches containing your search terms.

**Units and Managers**

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If you have access to more than one School/Center, you may search the Units for each by selecting the appropriate School/Center from the drop down menu.
To search by Inventory Manager, start typing the person's name, Penn ID or PennKey for a list of matches from Penn Community and select the matching name. You will then click the blue "Find" button, and you will be presented with a list of all Units to which you have access that are aligned to that Inventory Manager.

Your search results displayed will be dependent upon the "Fiscal Year" selected under the "Units and Managers" heading. NOTE: The “Fiscal Year” field will not appear if you have no Units created in a prior fiscal year. Using the drop down menu, choose the fiscal year for your search. If the current fiscal year is selected, you will be presented with a list of all current Units in "Edit" form based on your search criteria. If a prior fiscal year is selected, you will be presented with a list of all Units for that fiscal year in read-only "View" form.

Once you have completed your search, you may initiate a new search by clicking the blue "Clear" button and inputting new search terms, or you may refresh the list of all Units to which you have access by clicking the Clear and then Find buttons.

Be sure to clear prior search criteria before initiating a new search to ensure you get the full results.

C. **Downloading a Unit List**

To export a listing of all Units to which you have access (or all Units in your School or Center if you are a School/Center Administrator), click on the "Download" link on the upper right corner above School/Center column of the Unit list. Depending upon the browser you are using, you will be presented with various options to open or save the listing.
An Inventory is a collection structure for a group of related Assets.

**A. Adding an Inventory**

One of the first tasks for an Inventory Manager is to create Inventories within the Unit that will serve to organize the Unit’s Inventory of Assets. The Inventory Manager can establish as many Inventories as necessary for the Unit and define them in a way that is most appropriate for the Unit. For example, Inventories may be an inventory of departmental assets, research group assets, or assets related to certain business functions – whatever is most effective for you in organizing your Inventory of Assets.

To add an Inventory to your Unit, on the left navigation menu, click on “Add an Inventory”. You will be presented with the "Add an Inventory" screen. The Inventory box will be presented for creation.

There will be three required fields. The first required field, "Name", requires you to type in a unique name for the Inventory that you are adding to the Unit.

For example, you may create an inventory called "Business Office" that will list all the Assets associated with the Business Office for the Unit.

The next required field, "Status", requires you to indicate whether the Inventory is in "Draft" or "Final". The Inventory will default to “Draft” because you will need to have at least one Asset in “Final” status before you can change the Inventory status to “Final”. You will not designate an Inventory as “Final” until you have added all of the desired Assets associated with that Inventory and saved all of those Assets as “Final”.
**Note:** Inventory Managers will not be able to save an Inventory as Final unless the School/Center Administrator has completed their review of the underlying Assets and saved them as "Final".

In the last required field, "Unit", type the name of the existing Unit to which the Inventory will belong (unless you are an Inventory Manager assigned to only one Unit – in which case the Unit will be pre-populated). For example, since the Business Office Inventory relates to the Finance Unit, you will type "Finance" as the Unit.

Once you have entered the appropriate information for the three required fields, click on the blue "Save" button in the lower right of the Inventory box to save the newly created Inventory. You will then be presented with Inventory details such as "Last Updated By", "Created By" and the Unit's School or Center.

![Image of Inventory Edit Page]

Clicking the blue “Back” button under the "Edit an Inventory" heading, will take you to a list of Inventories to which you have access for the current fiscal year.

On this page, you also have the ability to add additional Inventories following the same process by selecting the green "Add an Inventory" button.

You also may edit or delete existing Inventories on this page. To edit an existing Inventory, click on the blue "Edit" button next to the name of the Inventory that you wish to edit, and you will be presented with the "Edit an Inventory" page. Make any required changes and click the blue "Save" button.
To delete an Inventory, select the box to the left of each Inventory name that you wish to delete, then click the green "Delete Checked" box under "Find Existing Inventories" heading. Note that you will not be able to delete an Inventory that contains existing Assets. You must first delete the existing Assets within the Inventory and then proceed to delete the Inventory. (See Module 5 for instructions on Assets).
B. Finding Existing Inventories

To find an existing Inventory to which you have access, on the left navigation menu, click on "Find Existing Inventories". You will be presented with the "Find Existing Inventories" screen and a listing of current Inventories within your authorized Unit(s).

On the "Find Existing Inventories" page, you have the ability to filter or search the inventories within your authorized Unit(s). To do this, click on "Show Filter" in the upper right corner of the "Find Existing Inventories" page if the filter options are not yet displayed. The "Find Existing Inventories" filter will be presented. You may search for an Inventory by using any of the following fields:

- Name (inventory name)
- Status
- Unit
- School/Center (will not appear unless you are a School/Center Administrator or Inventory Manager for more than one School or Center)
- Last Updated By
- Asset Name
- Fiscal Year (only if you had Inventories created in a prior fiscal year)
You may input full or partial information and then click the blue "Find" button for all but the Last Updated By field. To search by Last Updated By field, start typing the person's name, Penn ID or PennKey for a list of matches from Penn Community and select the matching name. You will be presented with all Inventories containing your search criteria.

The Inventories displayed as part of your search will be dependent upon the "Fiscal Year" selected under the "Find Existing Inventories" heading. The default is the current fiscal year. NOTE: The “Fiscal Year” field will not appear if you have no Inventories created in a prior fiscal year. Using the drop down menu, choose the fiscal year for the Inventories you wish to display. If the current fiscal year is selected, you will be presented with a list of all inventories in "Edit" form. If a prior fiscal year is selected, you will be presented with a list of all inventories for that fiscal year in read-only "View" form.

Once you have completed your search, you may initiate a new search by clicking the blue "Clear" button and inputting new search terms, or you may refresh the list of all Inventories within your authorized Unit(s) by clicking the Clear and then Find buttons.

Be sure to clear prior search criteria before initiating a new search to ensure you get the full results.
C. **Download an Inventory List**

To export a listing of all identified Inventories, click on the "Download" link on the upper right corner above the School/Center column of the Inventory list. Depending upon the browser you are using, you will be presented with various options to open or save the listing.
MODULE 5 - ASSETS

An Asset is an application or database that is being assessed because it contains Confidential University Data that the School/Center is responsible for designing, managing, administering or operating. This may include data sets that are stored on individual desktops, laptops, or other portable devices and is not limited to large, more centrally-supported applications and databases. Confidential University Data is defined in the Computer Security Policy.

A. Adding an Asset

A task for an Inventory Manager is to add Assets to an Inventory and then to assess those Assets. The Inventory Manager should add those Assets for which they are responsible for assessing and assign them to the appropriate Inventory.

To add an Asset to an existing Inventory, on the left navigation menu, click on “Find Existing Inventories”. You will be presented with a list of your existing Inventories. Click on the blue “Edit” button to the left of the Inventory to which you wish to add the new Asset.
The “Edit an Inventory” screen will be presented along with any existing Assets in that Inventory. Click on the green "Add an Asset" button under the Assets section to begin filling out the Asset form.
B. Providing General Information about the Asset

Begin by adding a unique name for the Asset in the Asset Name field. This may be an acronym or a few words that describe the system through which data is created, stored, and retrieved to support a business function.

In the “Person(s) Providing Input to Assessment” field, enter the names of the individuals who are providing input for this assessment and/or who are responsible for the data, application, process or other inventoried Asset.

In the "Type" field, select the type of Asset from the dropdown menu.
In the “Description of Asset” field, in a few words briefly describe the Asset and the context in which it is used.

In the “Confidential University Data: Type and Description” field, provide some additional detail about the type of information being processed, received, stored, or transmitted, and why it is deemed Confidential University Data. For example, Social Security numbers, personal health information or mission critical information such as budget or finance records.

In the “Quantity and Scope of Information” field, estimate the amount of information exposed using whatever quantifiable measures you think best apply in order to provide you with the perspective needed to prioritize your risk assessment. Scope refers to School-wide information, University-wide information, etc.

In the “Potential Impact of Breach or Loss” field, select High, Medium or Low from the dropdown menu. Refer to the University’s Data Sensitivity and Review Framework, for guidance to assess the potential consequences of unauthorized access to the Confidential University Data. Take into account the Type, Quantity and Scope of the Confidential University Data. This is not a quantitative assessment, but rather reflects a well-informed sense of potential consequences of a breach.

In the “Location” field, select all that apply from the list provided to describe how the data is maintained or stored.

In the "Review Status" field, select one of the options from the dropdown menu. If 'Scheduled for Future Fiscal Year' is selected, a text field will appear where you must enter a future fiscal year (four numeric values only). It is important to note that this step does not necessarily describe the year that risk mitigation strategies will be implemented. Rather, you are just targeting in which fiscal year a detailed risk assessment (not necessarily remediation effort) will be performed for each application and database in your inventory.

In the "Internal Notes or Comments" field, you may enter any additional notes that may help you with your review of the Asset.

C. Conducting the Risk Assessment for the Asset

Next we come to the Risk Assessment section. Here you are given the option to "Review Controls List" (for informational and reference purposes) or "Fill Out Controls List" (where you will indicate whether each listed control is in place) for the Asset. The Controls List is a set of considerations that help you determine the security and privacy risks to the Asset.

The Controls List is a set of additional questions that you can review to assess the security and privacy risks to this asset. Please indicate how you will use the Controls List by selecting one of the two options below.

- Review Controls List
- Fill Out Controls List
The "Review Controls List" option involves reviewing the Controls List as a reference but relying primarily upon already-established knowledge of the controls that are in place, and a sense of their adequacy or lack thereof, to determine any residual concerns.

The "Fill Out Controls List" option entails completing the Controls List with respect to the Asset and using that completed Controls List as the basis to determine any residual concerns.

Please indicate how you will use the Controls List by selecting the appropriate radio button.

**D. Directions for the “Fill Out Controls List” Option**

If you select the "Fill Out Controls List" option, you will be presented with seven categories of controls. The first category, "Physical", will be expanded for your assessment. The remaining six controls categories will follow and each will need to be expanded for assessment. These categories can be expanded or collapsed as necessary to move within the categories for assessment.

### Controls List

<table>
<thead>
<tr>
<th>Category</th>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical</td>
<td>Servers must be housed in a locked, physically secure area accessible only by those requiring access.</td>
<td>Select...</td>
</tr>
<tr>
<td>Physical</td>
<td>Regularly assess SOC 2/3 report adherence when using a data center or colocation facility.</td>
<td>Select...</td>
</tr>
<tr>
<td>Physical</td>
<td>Monitor physical access (e.g., with card swipe or sign in/out sheet) to secure facilities.</td>
<td>Select...</td>
</tr>
<tr>
<td>Physical</td>
<td>Ensure implemented policies are being adhered to on a regular basis.</td>
<td>Select...</td>
</tr>
<tr>
<td>Physical</td>
<td>Implement ipmi/bmc controls.</td>
<td>Select...</td>
</tr>
<tr>
<td>Physical</td>
<td>Establish access policies surrounding potentially sensitive data.</td>
<td>Select...</td>
</tr>
<tr>
<td>Physical</td>
<td>Put printers in restricted area if they are used to print confidential University data.</td>
<td>Select...</td>
</tr>
<tr>
<td>Physical</td>
<td>Use hardware locks on laptops when used at a desk.</td>
<td>Select...</td>
</tr>
<tr>
<td>Physical</td>
<td>Securely destroy all media containing sensitive data.</td>
<td>Select...</td>
</tr>
<tr>
<td>Physical</td>
<td>Ensure vendors providing materials that house sensitive data securely destroy data before repurposing (e.g. - printer)</td>
<td>Select...</td>
</tr>
</tbody>
</table>

**1. Answering Questions Regarding Controls**

When a category of controls is expanded, you will be presented with a table. The first column of the table identifies the category of controls such as "Physical", or "Network". The second column headed "Question", lists specific considerations concerning controls that apply to each category. In the third column, you are asked to indicate whether the specific control
consideration has been adopted. These options are "yes", "partial", "no", or "not applicable". Select the appropriate response from the dropdown menu for each control consideration within the category. When you have completed answering the control considerations for the current/presented category, then proceed to the next control category by clicking the expand button designated by the "+". While not necessary, you may minimize answered categories by clicking the collapse button designated by the ".-".

At any time you may save the Controls List page by clicking the blue "Save" button at the bottom of the page. Please note, however, when you “Save”, the Controls List page will be closed and you will be returned to the "Edit an Inventory:: Edit an Asset" page. To return to the Controls List page, you will now need to click the green "Open Controls List" button under the Risk Assessment section. At any time you may also exit the Controls List page by selecting the blue "Close without Saving" button at the top or bottom of the page. Please note, however, when you “Close without Saving”, the page will be closed without saving any newly entered information and you will be returned to the "Edit an Inventory:: Edit an Asset" page.

2. **Assessing the Residual Risk**

Once you have reviewed and/or completed the Controls List for each category, you will assign a risk level to each category of control under the section entitled "Residual Concerns" to address any additional concerns that remain after the controls are taken into account. You can do this by selecting the applicable level (Low, Medium, High) of residual risk from the dropdown menu for each appropriate control category.

You will then assess the overall residual risk for the Asset by selecting the applicable level (Low, Medium, High) from the dropdown menu next to "Overall Risk Assessment".
In the "Explanation of Concerns" field, you will want to explain the basis for your determination of the residual concerns.

In the "Plans to Address Concerns" field, describe briefly the planned steps/controls to be implemented to address the identified residual concerns. Reference any anticipated resource constraints (such as budget, staff) and indicate timeframes and projected impact on risk. Reminder: This step does not necessarily mean that you are implementing the steps/controls immediately. You are identifying which steps/controls your organization plans to implement in the future, and you can describe what those plans are. You are encouraged to include only plans that you believe are likely to go forward; you will be asked to report on their status in next year’s SPIA Submission.

In the "Progress to Date on Prior Plans" field, provide a brief report on the status of plans initiated in prior fiscal years.

Once you have entered and saved any information into the Controls List page, the "Residual Concerns" section of the Controls List page will also now appear on the "Edit and Inventory: Edit an Asset" page. Any subsequent edits made to the "Residual Concerns" section will be updated on both pages.
E. Directions for "Review Controls List" Option

If you select the "Review Controls List" option, you will be presented with a green "Open Controls List" button.

Risk Assessment

The Controls List is a set of additional questions that you can review to assess the security and privacy risks to this asset. Please indicate how you will use the Controls List by selecting one of the two options below.

- [ ] Review Controls List
- [ ] Fill Out Controls List

When you click the green "Open Controls List" button, you will be presented with seven categories of controls. The first category, "Physical", will be expanded for your review. The remaining six controls categories will follow and each will need to be expanded for review. These categories can be expanded or collapsed as necessary to move within the categories.

<table>
<thead>
<tr>
<th>Category</th>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical</td>
<td>Servers must be housed in a locked, physically secure area accessible only by those requiring access.</td>
<td></td>
</tr>
<tr>
<td>Physical</td>
<td>Regularly assess SOC 2/3 report adherence when using a data center or colocation facility.</td>
<td></td>
</tr>
<tr>
<td>Physical</td>
<td>Monitor physical access (e.g., with card swipe or sign in/out sheet) to secure facilities</td>
<td></td>
</tr>
<tr>
<td>Physical</td>
<td>Ensure implemented policies are being adhered to on a regular basis.</td>
<td></td>
</tr>
<tr>
<td>Physical</td>
<td>Implement ipmi/bmc controls</td>
<td></td>
</tr>
<tr>
<td>Physical</td>
<td>Establish access policies surrounding potentially sensitive data.</td>
<td></td>
</tr>
<tr>
<td>Physical</td>
<td>Put printers in restricted area if they are used to print confidential University data.</td>
<td></td>
</tr>
<tr>
<td>Physical</td>
<td>Use hardware locks on laptops when used at a desk</td>
<td></td>
</tr>
<tr>
<td>Physical</td>
<td>Securely destroy all media containing sensitive data.</td>
<td></td>
</tr>
<tr>
<td>Physical</td>
<td>Ensure vendors providing materials that house sensitive data securely destroy data before repurposing (e.g., - printer)</td>
<td></td>
</tr>
<tr>
<td>Network</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Platform</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Application</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Users and Data</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Identity and Access Management</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Governance, Risk and Compliance</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Close
When a category of controls is expanded, you will be presented with a table. The first column of the table identifies the category of controls such as "physical", or "network". The second column headed "Question", lists specific considerations concerning controls that apply to each category. The third column, entitled "Answer", will be blank unless you or another Inventory Manager have previously provided a response for that control category in the "Fill Out Controls List" option. When you have completed your review of the control considerations, click the blue "Close" button at the top or bottom of the Controls List page to return to the "Edit an Inventory: Edit an Asset" page.

Once you have reviewed the Controls List for each category and have returned to the "Edit and Inventory: Edit an Asset" page, you will assign a risk level to each category of control under the section entitled "Residual Concerns" to address any additional concerns that remain after the controls are taken into account. You can do this by selecting the applicable level (Low, Medium, High) of residual risk from the dropdown menu for each appropriate control category. You will then assess the overall residual risk for the Asset by selecting the applicable level (Low, Medium, High) from the dropdown menu next to "Overall Risk Assessment".

**Risk Assessment**
The Controls List is a set of additional questions that you can review to assess the security and privacy risks to this asset. Please indicate how you will use the Controls List by selecting one of the two options below.

- Review Controls List
- Fill Out Controls List

**Residual Concerns**
Now that you have reviewed and/or completed the Controls List, what additional concerns remain? For each control category below, assign a level of risk to this asset after the controls are taken into account.

- Physical
  - Select...
- Network
  - Select...
- Platform
  - Select...
- Application
  - Select...
- Users and Data
  - Select...
- Identity and Access Management
  - Select...
- Governance, Risk and Compliance
  - Select...

**Overall Risk Assessment**
Select...

**Explanation of Concerns**

**Plans to Address Concerns**

**Progress to Date on Prior Plans**
In the "Explanation of Concerns" field, you will want to explain the basis for your determination of the residual concerns.

In the "Plans to Address Concerns" field, describe briefly the planned steps/controls to be implemented to address the identified residual concerns. Reference any anticipated resource constraints (such as budget, staff) and indicate timeframes and projected impact on risk. Reminder: This step does not necessarily mean that you are implementing the steps/controls immediately. You are identifying which steps/controls your organization plans to implement in the future, and you can describe what those plans are. You are encouraged to include only plans that you believe are likely to go forward; you will be asked to report on their status in next year’s SPIA Submission.

In the "Progress to Date on Prior Plans" field, provide a brief report on the status of plans initiated in prior fiscal years.

F. Success in the Management of this Asset Section

Next we come to the Success in the Management of this Asset section. In the "Success in the Management of this Asset" field, you are asked to highlight any successes in how information for this Asset is currently being managed. For example, we have encrypted the data in this application.

G. Completing Executive Summary Section as an Inventory Manager

You will next proceed to the Executive Summary section. In the "Per Manager, Include this Asset in the Executive Summary", if you are the Inventory Manager, you will make a suggestion to your School/Center Administrator on whether to include this Asset in the Executive Summary by selecting "Yes" or "No" from the dropdown menu. You may want to include Assets that identify areas of greatest concern or that highlight successes in how information is currently being managed.

In the "Completed by Manager" field, you need to indicate whether you have completed your assessment of the Asset by selecting “Yes” or “No” from the dropdown menu. This will inform your School/Center Administrator that the Asset is ready for their review.
H. Completing Executive Summary Section as a School/Center Administrator

If you are the School/Center Administrator, you will see whether the Inventory Manager has made a recommendation to include the Asset in the Executive Summary, and you will be presented with two additional fields in this section. In the "Per Administrator, Include this Asset in the Executive Summary" field, you will then make the final determination on whether to include the Asset in the Executive Summary by selecting "Yes" or "No" from the dropdown menu. You may want to include Assets that identify areas of greatest concern or that highlight successes in how information is currently being managed.
Please note that if you select "Yes", certain information about this Asset will automatically populate in the Executive Summary (outlined more fully in the Executive Summary training directions). Please note that if you select "No", the Asset information will not appear in the Executive Summary -- even if the Inventory Manager had recommended "Yes" in their response field.

In the "Comments About this Asset to Include in the Executive Summary", you may provide additional comments about this Asset for inclusion in the Executive Summary. These comments will automatically populate in the Executive Summary.

You will also see in this section whether the Inventory Manager has completed the assessment of the Asset. The Inventory Manager selects 'Yes' when they are done assessing the Asset to indicate that the Asset is ready for the School/Center Administrator to finalize. When the value is 'Yes', the Inventory Manager has completed all required fields so that you may save the Asset as “Final”. If the value is “No”, you should wait for the Inventory Manager to complete the review, or you may save the Asset as “Final” but you will be required to complete any remaining required fields.

I. Saving an Asset as an Inventory Manager

Once you have entered information about an Asset, you can save the Asset at any time as long as you have provided an Asset name. To save Asset information, select the blue "Save as Draft" button in the lower right corner of the page.

If you seek to save a new Asset as Draft in an Inventory that has previously been marked as Final, you will receive a warning message that if you proceed, the Inventory will be reverted back to Draft.
NOTE: An Asset may only be saved as “Final” by the School/Center Administrator. Once you have completed your assessment, the School/Center Administrator will then decide whether to include the Asset in the Executive Summary based on your recommendation. Once the School/Center Administrator makes that determination, then the School/Center Administrator may save the Asset as “Final”.

IMPORTANT: If at a later date, you seek to make changes to the Asset, but your School/Center Administrator has saved the Asset as Final, any changes you make to either the Asset information or the Saved status of the Asset must be communicated to your School/Center Administrator because it may have implications on the Executive Summary – particularly if your School/Center Administrator has already created the Executive Summary.

Selecting the blue "Back" button, will take you to back to the “Edit an Inventory” page where you will see the list of Assets within the Inventory. You then have the ability to add additional Assets following the same process by selecting the green "Add an Asset" button.

If you select the blue "Back" button after making any edits to the Asset information without saving, you will be presented with a pop-up warning message prompting you to either "Cancel" so that you may first save your changes to the Asset information, or "Continue" going back to previous page, but losing any unsaved changes.

J. Saving an Asset as a School/Center Administrator

You may save any changes you have made to an existing Asset by selecting the blue "Save as Draft" button at the bottom of the page.

If you are creating a new Asset, you can save the Asset at any time as long as you have provided an Asset name. If you seek to save the new Asset as Draft in an Inventory that has previously been marked as Final, you will receive a warning message that if you proceed, the Inventory will be reverted back to Draft.

As a School/Center Administrator, you will eventually need to save an Asset as “Final”. In order to save an Asset as “Final”, you will first need to determine if the Inventory Manager has completed the assessment of the Asset. You may determine if the Asset has been completed and ready for review by either 1) looking under the "Completed by Manager" column for the Asset within the applicable Inventory; or 2) looking at the "Completed by Manager" field at the bottom of the Asset Form.
You will only select the blue "Save as Final" button at the bottom of the page if your Inventory Manager has indicated that the review of the Asset is complete (which means that the Inventory Manager has completed all required fields) or you are going to complete any remaining required fields for the Asset.

Selecting the blue "Back" button once you have saved the Asset as “Final”, will take you to back to the “Edit an Inventory” page where you will see the list of Assets within the Inventory. You then have the ability to add additional Assets following the same process by selecting the green "Add an Asset" button.

If you select the blue "Back" button at the top left or bottom of the page after making any edits to the Asset information without saving, you will be presented with a pop-up warning message prompting you to either "Cancel" so that you may first save your changes to the Asset information, or "Continue" going back to previous page, but losing any unsaved changes.
K. Editing or Deleting an Asset

To edit or delete an Asset to an existing Inventory, on the left navigation menu, click on “Find Existing Inventories”. You will be presented with a list of your existing Inventories. Click on the blue “Edit” button to the left of the Inventory in which the Asset you wish to edit or delete is located, and you will be presented with the “Edit an Inventory” page and a list of Assets located within that Inventory.

To edit an existing Asset, click on the blue "Edit" button next to the name of the Asset that you wish to edit.
You will be presented with the "Edit an Inventory :: Edit an Asset" page. Make any required changes and click the appropriate "Save as Draft" or "Save as Final" button, as appropriate.
To delete an Asset, check the box to the left of each Asset name that you wish to delete, then click the green "Delete Checked" box under the "Assets" heading. You will be presented with a pop-up warning message prompting you to either "Cancel" permanent deletion of the Asset or "Continue" to permanently delete the Asset. Please note that if the Executive Summary for the School/Center is in Final status, you will not be able to delete an Asset until you have reverted the Executive Summary back to Draft.

If you wish to delete all Assets in an Inventory, your Inventory will need to be in Draft status and then you may click the top-level check box at the top left of the Asset list. You will be presented with a pop-up warning message prompting you to either "Cancel" permanent deletion of the Assets or "Continue" to permanently delete the Assets. The Inventory will remain, but it will contain no Assets.
MODULE 6 – EXECUTIVE SUMMARY

School/Center Administrators

A. Creating the Executive Summary

To create an Executive Summary, on the left navigation menu, click on “Executive Summary”. You will be presented with the Executive Summary screen defaulted to the current fiscal year. A draft Executive Summary for the current fiscal year will be presented containing information from those Inventories that are Final and related Assets within those Inventories that the School/Center Administrator marked as "Yes" in the Asset form for inclusion in the Executive Summary.

IMPORTANT: If Inventories containing Assets that the School/Center Administrator marked as "Yes" in the Asset form for inclusion in the Executive Summary are “Draft”, the Assets in those “Draft” Inventories will not appear in the Executive Summary.

If no Inventories containing Assets for inclusion in the Executive Summary are “Final”, a draft Executive Summary will not be presented and you will receive a message that there is no data that is eligible for the Executive Summary for this School/Center.

If you select a prior fiscal year from the Fiscal Year drop down menu, you will be presented the Executive Summary for that fiscal year in read-only format. You will not be presented the Fiscal Year drop down menu if no Executive Summary was created in prior fiscal years.
B. General Summary Information of Executive Summary

The header lists the School/Center for this Executive Summary. It reflects the current status of the Executive Summary (Draft or Final), the School/Center Administrator who last updated (i.e., saved) the Executive Summary, and the date and time of the last update.

Next, the Executive Summary provides the Total Asset Count for the School/Center. This number represents the total number of Assets assessed.

The "Key Learning" field is a free text field where you will want to summarize any key learnings from your School/Center’s assessment process and identify any follow-up steps pertinent to future assessments.

The "General Concerns" field is a free text field where you will want to summarize any overall general concerns or areas of greatest concern.
The "Success in Current Information Management" is a free text field where you will want to highlight any successes in how information in your School/Center is currently being managed.

For any of the three free text fields described above, you may want to refer to pre-populated asset information to help you summarize this information.

You may save your entries for the Executive Summary at any time by selecting the blue "Save as Draft" button located in the middle of the page after the general summary information or at bottom of each page after the specific Asset information. Please note that you will only select the blue "Save as Final" once you have finalized all sections of your Executive Summary. When you save your Executive Summary, the “Last Updated” field in the header of the Executive Summary will change to reflect the last saved date and time.
C. The “Reload Assets” Button

1. Editing Existing Asset Information

The Reload Assets button is only necessary if you make changes to underlying Asset forms and you wish to bring the information forward for the Asset(s) into the Executive Summary.

If you only want to edit the Asset information in the Executive Summary, you do not need to select the Reload Assets button and instead you may make those edits directly to the Asset information in the Executive Summary. As a reminder, these changes to the Asset information will not appear in the underlying Asset form.

WARNING: If you select "Reload Assets", you will be deleting any Asset-level "Comments" or edits (e.g., if you previously selected the "Remove" link to delete a specific Asset) that you have made and saved to the Specific Asset Information Section of the Executive Summary. You will be reloading all the Asset information from the underlying Asset forms for all Assets in all Inventories. Additionally, any Inventory and Asset whose status may have since been changed back to Draft will be removed from the Executive Summary until the Inventory is saved as Final again.

Red asterisks will appear next to all Assets in the Inventory when the Reload Assets button has been selected until you save the Executive Summary with the reloaded information. As long as the red asterisks appear, any changes made to the Assets in the underlying Asset form will appear automatically in the Executive Summary.
### This Page

**Inventory Name** University Compliance  
**Unit** OACP - Compliance  
**Total Asset Count** 2  
*The total number of assets for this inventory, whether included in this executive summary or not.*

### Specific Asset Concerns

*Summarize issues with assets of greatest concern.*

<table>
<thead>
<tr>
<th>Asset Name</th>
<th>Open Snapshot</th>
<th>Remove</th>
<th>Confidential University Data: Type and Description</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>NAVEX</td>
<td></td>
<td></td>
<td>Investigation information that may include personal information.</td>
<td>OACP will conduct periodic security reviews with vendor.</td>
</tr>
</tbody>
</table>

### Improvements Planned

*Describe briefly any significant improvement plans, their timelines and budget. Also describe specific outcomes in terms of reducing risk, including quantitative measure, if known.*

<table>
<thead>
<tr>
<th>Asset Name</th>
<th>Open Snapshot</th>
<th>Remove</th>
<th>Confidential University Data: Type and Description</th>
<th>Plans to Address Concerns</th>
</tr>
</thead>
<tbody>
<tr>
<td>NAVEX</td>
<td></td>
<td></td>
<td>Investigation information that may include personal information.</td>
<td>Implement periodic security reviews with vendor.</td>
</tr>
</tbody>
</table>

### Prior Year Improvement Plans Update

*Provide an update on the status of prior year improvement plans. Not necessary for first year using SPVA.*

<table>
<thead>
<tr>
<th>Asset Name</th>
<th>Open Snapshot</th>
<th>Remove</th>
<th>Confidential University Data: Type and Description</th>
<th>Progress to Date on Prior Plans</th>
</tr>
</thead>
<tbody>
<tr>
<td>NAVEX</td>
<td></td>
<td></td>
<td>Investigation information that may include personal information.</td>
<td>N/A</td>
</tr>
</tbody>
</table>

*This asset was newly added since the executive summary was last saved.*
2. **Adding a New Asset to a Final Inventory**

The Reload Assets button is not necessary if you add a **NEW** Asset to an underlying Inventory saved as Final.

Once you have information loaded in the Executive Summary, if you add a **NEW** Asset to an underlying Inventory, the Executive Summary will automatically include that new Asset if the School/Center Administrator has marked it as "Yes" in the Asset form for inclusion in the Executive Summary and the Inventory and Asset have been saved as Final.

A single red asterisk will appear next to the Asset Name for any newly added Asset to the Executive Summary.

D. **Specific Asset Information Section of Executive Summary**

Next, you will see certain information about those Assets that the School/Center Administrator made a final determination to include in the Executive Summary. The Assets will be organized by Inventory -- listing one Inventory per page.

For each Inventory, you will be presented with the Inventory Name, the Unit to which the Inventory belongs, and the total number of Assets in the Inventory regardless of whether or not the School/Center Administrator marked the Assets as "Yes" in the Asset form for inclusion in the Executive Summary.

In the "**Specific Asset Concerns**" section, you are asked to summarize issues with Assets of greatest concern. The section will pre-populate the name of the Assets, the type and description of Confidential University Data for the Assets, and any comments that were listed in the "Comments About This Asset to Include in Executive Summary" from the underlying Asset form.

In the "**Improvements Planned**" section, you will be briefly describe any significant improvement plans, the timelines and budget, and any expected outcome in terms of reducing risk. The section will pre-populate the name of the Assets, the type and description of Confidential University Data for the Assets, and any comments that were listed in "Plans to Address Concerns" from the underlying Asset form.

In the "**Prior Year Improvement Plans Update**" section, you will provide an update on the status of any prior-year improvement plans. The section will pre-populate the name of the Assets, the type and description of Confidential University Data for the Assets, and any comments that were listed in "Progress to Date on Prior Plan" from the underlying Asset form.

**NOTE:** The comments fields for each of these sections are editable within the Executive Summary; however, these edits will not be reflected in the underlying Asset form. You may
also view, in read-only format, the underlying Asset form for each Asset in each section by selecting the "Open Snapshot" link located next to the "Asset Name".

To remove a specific Asset from a section, you may select the "Remove" link located next to the "Asset Name". The Asset will be removed only from that section. Once removed, you will not be able to have the Asset appear in this section again unless you select the red "Reload Assets" function.

**Reload Assets**

Result listings: 1 of 3

<table>
<thead>
<tr>
<th>Inventory Name</th>
<th>University Compliance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit</td>
<td>OACP - Compliance</td>
</tr>
<tr>
<td>Total Asset Count</td>
<td>2</td>
</tr>
</tbody>
</table>

*The total number of assets for this inventory, whether included in this executive summary or not.*

**Specific Asset Concerns**

*Summarize issues with assets of greatest concern.*

1. **Asset Name**: Open Snapshot

   **Remove**

   **Confidential University Data: Type and Description**
   Investigation information that may include personal information.
   **Comments**
   OACP will conduct periodic security reviews with vendor.

**Improvements Planned**

*Describe briefly any significant improvement plans, their timelines and budget. Also describe specific outcomes in terms of reducing risk, including quantization measure, if known.*

1. **Asset Name**: Open Snapshot

   **Remove**

   **Confidential University Data: Type and Description**
   Investigation information that may include personal information.
   **Plans to Address Concerns**
   Implement periodic security reviews with vendor.

**Prior Year Improvement Plans Update**

*Provide an update on the status of prior-year improvement plans. Not necessary for first year using SPIA.*

1. **Asset Name**: Open Snapshot

   **Remove**

   **Confidential University Data: Type and Description**
   Investigation information that may include personal information.
   **Progress to Date on Prior Plans**
   N/A

*This asset was newly added since the executive summary was last saved.*

Result page: 1 2 3 Next
WARNING: If you select "Reload Assets", you will be deleting any Asset-level "Comments" or edits (e.g., if you previously selected the "Remove" link to delete a specific Asset) that you have made in the Executive Summary. You will be reloading the Asset information from the underlying Asset forms for all Assets in all Inventories. Additionally, any Inventory and Asset whose status may have since been changed back to Draft will be removed from the Executive Summary until the Inventory is saved as Final again.

E. Navigating Between Specific Asset Information For Each Inventory

Recall that the Assets will be organized by Inventory -- listing one Inventory per page. To navigate between Inventories, you will select the "Result page" numbers at the bottom. The General Information of the Executive Summary and free text sections of the Executive Summary display on each page and you will still be able to edit the free text fields as needed. The designated Inventory will then appear with its specific Asset information.

F. Saving the Executive Summary

You may save your entries for at the Executive Summary at any time by selecting the blue "Save as Draft" button at the bottom of the page. Please note that you will only select the blue "Save as Final" button at the bottom of the page if your Executive Summary is complete. By saving your Executive Summary as "Final", you will release it for review to OACP and Info Sec as well as any other designated Executive Reviewers. Once you "Save as Final" any free text fields will become non-editable in the Executive Summary.
If you need to make any subsequent changes or revisions to the Executive Summary once you have saved it as “Final”, you will need to select the blue "Revert to Draft" button located in the middle and bottom right of the Executive Summary page. Additionally, for the current fiscal year, you may not delete any underlying Assets or Inventories that have been included in the final Executive Summary until you first revert the Executive Summary back to draft.

G. **Assigning Executive Reviewers**

Executive Reviewers are individuals within a School/Center who have read-only access to the School/Center's Executive Summary as well as the underlying Inventories and Assets once the School/Center Administrator has saved the Executive Summary as "Final".

To create an Executive Reviewer, on the left navigation menu, go to Administration (expand if necessary), and click on Executive Reviewers.
The “Executive Reviewers” page will be presented. Click the green “Add an Executive Reviewer”. The "Executive Reviewers: Add an Executive Reviewer" page will appear. In the User box, start typing the person's name, PennID or PennKey for a list of matches from Penn Community. Once the name of the appropriate person is presented, click on the name and then click the blue "Save" button.

H. Downloading the Executive Summary

The application also provides you the ability to download the Executive Summary at any time by selecting the blue "Download Report" button in the upper right of the page. Depending upon the browser you are using, you will be presented with various options to open or save the listing.
MODULE 7 – ASSET REPORTS

If you wish to create a report of Assets containing certain attributes, on the left navigation menu, select Asset Report.

You will be presented with the "Asset Report" screen which will list all of the fields of an Asset found in the Asset Form. You can produce a list of Assets based upon the values that you select. You may tailor your list of Assets by selecting one or more specific values.
For example, if you wish to obtain a list of all Assets containing Social Security number information where the "Overall Risk" is "High", you could type "SSN" and "social security" in the "Confidential University Data" field and select "High" from the drop down menu in the "Overall Risk" field.

You then select the blue "Execute report" button at the bottom of the page. Your results listing Assets with the selected values will appear directly below the "Execute report" button.

**NOTE:** If you do not select any specific values, you will receive a full listing of Assets to which you have access.

These results can also be exported to Excel by selecting the "Export as xls" link in the middle of the table at the top of the results screen. You may need to scroll across using the bar at the bottom of the page.

If you wish to run another report of Assets containing different attributes, choose the blue "Clear" button and select your new criteria.