




January 5, 2021

**MEMORANDUM**

**TO:** Michael Oishi, Chair  
Leeward Community College Faculty Senate

Junie Hayashi, Vice Chair  
Leeward Community College Faculty Senate

**FROM:** Garret T. Yoshimi   
Vice President for Information Technology/Chief Information Officer

**SUBJECT:** Consultation on Proposed Changes to AP2.215, Mandatory Training on Data Privacy and Security

Attached for your review are tracked changes and clean versions of AP2.215, an administrative procedure for mandatory training on data privacy and security. AP2.215 was previously established in 2018 and is currently being revised. The proposed revision: 1) expands the training requirement from data users with access to large quantities of data to all UH employees (with an exception for those who meet specific criteria); 2) changes the timing of the two training requirements—the General Confidentiality Notice (GCN) and the Information Security Awareness Training (ISAT); and, 3) updates the AP's title to reflect the focus on data privacy and security.

The GCN is an acknowledgement that individuals will protect the data they work with (see attached). The ISAT takes less than an hour to complete and covers principles for sound data management, data related regulations, standards, and policies that apply to the University, and cybersecurity best practices. A summary table of the changes are attached for your reference.

We are expanding the scope of the training program to ensure our University community understands the importance of integrating best practices and privacy and security considerations in our daily work to reduce the risk of data exposures and breaches. Implementing an annual employee training program is critical to keeping our institutional assets safe as the frequency and sophistication of cybercrimes continue to increase across all industries. In addition, the federal government has been tightening its regulations around the protection of both institutional and research data, and in some cases, explicitly require employee training programs.

The proposed revisions have been shared with chancellors and other system and campus administrators, RCUH, and UH Foundation. They were also shared at three systemwide data governance and information security briefings from October through December. We have reached out to UHPA for comments as well.

To share your feedback or if you have questions, contact Sandra Furuto at [yano@hawaii.edu](mailto:yano@hawaii.edu) by Friday, February 5, 2021. Should you wish to have a discussion, please let her know. Thank you for your attention.

Attachments

c: System Director of Data Governance Sandra Furuto