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ALABAMA STATE UNIVERSITY (ASU)

Office of Technology Services (OTS)

Awareness and Training Policy

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Document

Document	Awareness and Training
References	NIST 800-171 Rev2 / CMMC Rev2 Level II
Control	3.2 AWARENESS AND TRAINING
Last Approved	
Next Review	

Annual Review and Revision Tracking

Date	Summary of Changes Made	Changes Made By (Name/title)	Version History

Overview

A quality security awareness training program should provide both general, enterprise-wide training measures, along with subject matter specifically relating to the applicable compliance requirement or any other necessary mandate. Ultimately, a sound security awareness program should implement the core components of Awareness, Training, and Education.

"Awareness" in that numerous measures are initiated and implemented to keep all employees knowledgeable about the threats, responses and solutions to security issues affecting an organization. "Training" in that material is researched, developed and subsequently utilized for educating employees on all aspects of security awareness. And lastly, "Education, in that adequate measures are undertaken for ensuring continuing education on security awareness is provided to all employees on a routine basis – whatever that may be – quarterly, annually, etc. It must be stressed that security awareness training is dynamic in nature, changing as needed to meet the growing threats facing organizations.

In accordance with mandated University security requirements set forth and approved by the Board, ASU has established a formal Awareness and Training (AT) policy. This policy is to be implemented immediately. Additionally, this policy is to be evaluated on an annual basis for ensuring its adequacy and relevancy regarding ASU's needs and goals.

Purpose

This policy is designed to provide ASU with a documented and formalized Awareness and Training (AT) policy that is to be adhered to and utilized throughout the University at all times. Compliance with the stated policy will ensure the safety and security of ASU information systems.

Scope

This policy and supporting procedures encompasses all information systems that are owned, operated, maintained, and controlled by ASU and all other information systems, both internally and externally, that interact with these systems.

- Internal information systems are those owned, operated, maintained, and controlled by ASU and include all network devices (firewalls, routers, switches, load balancers, other network devices), servers (both physical and virtual servers, along with the operating systems and the underlying application(s) that reside on them) and any other information systems deemed in scope.
- External information systems are those owned, operated, maintained, and controlled by any entity other than ASU, but for which such external resources may impact the confidentiality, integrity, and availability (CIA) and overall security of the aforementioned description of "Internal information systems".

Note: While ASU does not have the ability to actually provision, harden, secure, and deploy another organization's information systems, ASU will follow due-diligence and best practices by obtaining all relevant information ensuring that such systems are safe and secure.

Roles and Responsibilities

Implementing and adhering to the University's policies and procedures is a collaborative effort, requiring a true commitment from all personnel, including management, students, and users of information systems, along with vendors, contractors, and other relevant third parties. Additionally, by being aware of one's roles and responsibilities as it pertains to ASU information systems, all relevant parties are helping promote the Confidentiality, Integrity, and Availability (CIA) principles for information security in today's world of growing cybersecurity challenges.

- **Management Commitment:** Responsibilities include providing overall direction, guidance, leadership and support for the entire information systems environment, while also assisting other applicable personnel in their day-to-day operations. The Vice President of Technology Services is to report to other members of Board on a regular basis regarding all aspects of the University's information systems posture.
- **Personnel:** Responsibilities include adhering to the University's information security policies, procedures, practices, and not undertaking any measures to alter such standards on any ASU information systems. Additionally, end users are to report instances of non-compliance to senior authorities, specifically those by other users. End users – while undertaking day-to-day operations – may also notice issues that could impede the safety and security of ASU information systems and are to also report such instance immediately to senior authorities.

Policy

ASU is to ensure that all applicable users adhere to the following policies for purposes of complying with the mandated University security requirements set forth and approved by the board. ASU shall:

- Ensure that managers, systems administrators, and users of University’s systems are made aware of the security risks associated with their activities and of the applicable policies, standards, and procedures related to the security of those systems.
- Ensure that personnel are trained to carry out their assigned information security-related duties and responsibilities.
- Provide security awareness training on recognizing and reporting potential indicators of insider threat.

Compliance Mapping Matrix

The following Matrix is to be completed for purposes of cross-referencing and effectively mapping the basic and derived security requirements with existing information security policies and procedures for ASU.

Basic and Derived Security Requirements	Listing of Applicable POLICY and/or STANDARD OPERATING PROCEDURES (SOP) Documentation	Notes and Comments
NIST SP 800-171 Rev2 3.2.1	Role-Based Risk Awareness	
NIST SP 800-171 Rev2 3.2.1	Role-Based Training	
NIST SP 800-171 Rev2 3.2.1	Insider Threat Awareness	

References

Related Regulations, Statutes, Policy and/or STANDARD OPERATING PROCEDURES (SOP) Documentation	Notes and Comments
Access Control	

Responsibility for Policy and Procedures Maintenance

ASU is responsible for ensuring that the aforementioned policy initiatives, and if applicable – the relevant procedures – are kept current as needed for purposes of compliance with mandated University security requirements set forth and approved by the Board.

Definitions

Personnel – All community users of all information systems that are the property of ASU. Specifically, it includes:

- All faculty, staff and student workers, whether employed on a full-time or part-time basis by ASU.
- All contractors and third parties that work on behalf of and are paid directly by ASU.
- All contractors and third parties that work on behalf of ASU but are paid directly by an alternate employer.
- All employees of partners and clients of ASU that access ASU’s non-public information systems.
- All volunteers and alumni that serve on behalf of ASU.
- All students attending ASU.

Violation of Policy

Violation of any of the constraints of these policies or procedures will be considered a security breach and depending on the nature of the violation, various sanctions will be taken:

1. First Incident of a minor breach will result in verbal reprimand by the policy owner as outlined in the Personnel Disciplinary Policy found in the ASU Personnel Handbook. If the offender already has a verbal reprimand for the same infraction, the incident will be remanded to Human Resources as outlined below.
2. Multiple minor breaches or a major breach will be remanded to Human Resources and Executive Management for disciplinary action as outlined in the Personnel Disciplinary Policy found in the ASU Personnel Handbook.
3. In the case of a student, the breach will also be remanded to the Dean of Students.

Disclosure

ASU reserves the right to change and modify the aforementioned document at any time and to provide notice to all users in a reasonable and acceptable timeframe and format.

Signature

Name

Title

Date