

Luther Seminary Software System Access Management Policy

I. Overview/Purpose

This policy defines the process for requesting, granting, and auditing access to software systems that house financial information. Additional reviews are done for cloud hosted systems.

II. Scope

This policy applies to any Luther Seminary software system that holds financial data.

III. Definitions

Software System - a software application that will either be used by Luther Seminary users or will store information about Luther Seminary users.

IV. Policy

The procedures below outline the policy which applies to software systems that hold financial data.

1. Separation of duties.
 - a. Changes in user access to such systems is requested from the help desk by emailing helpdesk@luthersem.edu.
 - b. IT then requests approval from the data steward* for the system.
 - c. IT then grants access if approved. Only IT has the ability to change access levels.
2. Annual access review during the financial audit period.
 - a. IT provides the data steward* with a list of current users and their access level.
 - b. The data steward* then notes any changes to be made.
 - c. IT then processes any changes.
3. Annual review of a cloud provider's security controls during the financial audit period.
 - a. The CIO or designate requests a 3rd party security assessment (SSAE 16, SOC II or equivalent) from the cloud provider and then reviews and records the results.
 - b. Providers with repeated security issues should be considered higher risk and renewal of their contracts considered carefully.

* *data steward* - someone in the application's primary department with the knowledge and authority to decide on appropriate access.

Revision History

| Revision | Change | Date |
|----------|-----------------|------------|
| 1.0 | Initial Version | 08/03/2021 |
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