



Office of the Chief Information Officer

# Financial Managers Advisory Council

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Office of the Chief Information Officer

# Online File Storage Guidance



*The Washington Post*  
State employee loses  
587,000 confidential health  
records on memory stick



## Workarounds: **Awkward!**

- Lost data
- Co-mingled personal, state data
- Dubious personal email security
- Virus risk

Employees need files and data:

- Where they are working
- On devices they are using

To collaborate they share files with state employees, non-state employees

Employees were using state provided services, tools



## Consumer Cloud: **High Risk!**

(but convenient)

- Archiving and discovery
- Confidentiality
- ... but at least it's more controlled

*Employees are now beginning to use consumer grade services, personal accounts*

Agencies are responsible for state records but cannot:

- Track document locations or devices
- Search
- Retrieve
- Expire or delete
- Ensure Confidentiality, Integrity, Availability

Click-through Agreements = Unapproved, Unacceptable Contracts

State Records Leave With Exiting Employee



## Enterprise Cloud: **Awesome!**

- Meets our requirements
- Enhances productivity
- Clear guidance

### ***Solution:***

1. Provide guidance to agencies for using Online File Storage Services
2. Provide Employee Education and Awareness
3. Select Enterprise Class Services
  - Satisfy business needs
  - Meet state requirements
  - Via Master Contracts



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## ***Guiding Principles For State Records Management***

### Agency

### *The Agency, not Employees, Own State Records*

1. Approves storage services and devices
2. Assigns officials to manage record types
3. Authorizes official(s) to make decisions on data storage, sharing, protection , etc.
4. Classifies data based on sensitivity



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## ***Guiding Principles For State Records Management***

Employee

*Employees are Custodians of State Records*

1. Store records only on agency approved Services or Devices
2. Minimize the Number of Storage Locations or Devices
3. Be Accountable to Store, Share, Protect State Records According to Agency Policy
4. Keep Records As Long As Required, then Delete them As Directed



## ***Guidelines***

### ***Agency Guidelines***

Q: How Does an Agency Begin?

- Expressly Authorize Use of Selected Services

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## ***Guidelines*** ***Agency Guidelines***

Q: What are the Contractual Considerations?

- Addressed by Master Contracts
- Consult Agency Attorneys and AAG

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## **Guidelines**

### **Agency Guidelines**

Q: How should Agencies Treat Original Records vs. Copies?

- Treat Online File Services as Temporary Storage for Collaboration.
- Create, Retain, and Expire Original Records on “Systems of Record”
- Share copies of Records for Collaboration on “Systems of Engagement” – Approved Online File Storage Services
- Remove copies from “Systems of Engagement” When Use is Completed



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## **Guidelines**

### **Agency Guidelines**

Q: Is Central Administration Necessary?

- Yes. Agency administrators:
  - Create and de-activate accounts
  - Search, Manage Records for All Agency Employees



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## **Guidelines**

### **Agency Guidelines**

Q: How Should Agencies Educate Employees?  
Cover:

- Benefits and Opportunities
- Approved Services
- Types of Records that Can and Cannot Be Shared
- Employee's Role as Custodian to Manage State Records
- Risks from Mistakes or Mis-Use



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## **Guidelines**

### **Employee Guidelines**

Q: Can Employees Use Personal Accounts?

- No. Use only Agency Provided Accounts on Approved Services.
- Do Not Use Personal Email Accounts
- Move State Records from Existing Personal Accounts to Agency Provided Services and Accounts
- Do Not Co-Mingle Personal and State Records



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## **Guidelines**

### **Employee Guidelines**

Q: How Can Employees Avoid Losing Track of State Records?

- Use the Fewest number of Approved Storage Locations and Services
- Establish Automatic Expiration periods.
- Do Not Let Files Remain Online or On Approved Devices Longer than Necessary
- Employees Leaving the Agency Should Transfer All Managed Records to the Appropriate Custodian



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## **Guidelines**

### **Agency Guidelines**

Q: How Can Employees Protect State Records On Online File Storage Services?

- Use Shared Folders, Not Public Folders
- Authorize Access to Specific Individuals or Groups
- Allow Only the Level of Access Needed: Read, Edit, Download

# Questions?

# Thank You

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