

TITLE: Information System Activity Review and Reporting Policy

Category: Technical Support	
Original Effective Date: 3-12-08 Revision Date:	Review Date: February 2008

INFORMATION SYSTEM ACTIVITY REVIEW

ACCEL and Barton will implement procedures to monitor and regularly review records of information system activity, such as audit logs, access reports, and security incident tracking reports.

1. Barton IT Department staff will monitor system and security logs on a periodic basis. Special focus will be given to ACCEL firewall and Server audit logs, access reports, and security incident tracking reports.
2. Barton IT Department staff will regularly review records of system activity at an interval that does not exceed, but may be less than, 90 days. The internal audit procedure will utilize audit logs, activity reports, or other mechanisms to document and manage system activity on the ACCEL system.
3. Security incidents such as activity exceptions and unauthorized access attempts will be detected, logged and reported immediately to the appropriate system management, security and privacy officers.

INFORMATION ACTIVITY INCIDENT REPORTING

- A. Barton IT Staff will report security incidents as quickly as possible to the Barton IT Director to determine next steps. Depending on the severity of the incident and per the discretion of the Barton IT Director, the following steps may be taken:
 1. the security incident may be reported to the Data Custodian and/or the Participant designee on the Steering Committee and the ACCEL Program Administrator.
 2. If the Participant representative on the Steering Committee cannot be reached, the user's ability to access the ACCEL system will be removed. The user and the Steering Committee Participant representative will be notified via email of system access removal.
 3. The Participant will investigate the security incident and report back outcomes to the Barton IT Director.
- B. Security incidents and their outcomes will be reported to the Steering Committee who will determine any further actions as needed.