

Data Access Guideline – Access to Financial Data Addendum

This addendum describes the vetting process undertaken to identify and address concerns with having unlimited span of control access to financial data for authorized University employees of UW's systems, as proposed in the "*Data Access Guideline – Open Financial Data*".

Advisory Opinions Sought

The Office of the Controller worked with the Roles and Access Task Force of the Data Management Committee to conduct an appropriate vetting process. The concept of open financial data was shared with the Deans of Arts and Sciences, Engineering, Public Health, Public Affairs, Nursing, Pharmacy, Business, Ocean and Fisheries, Built Environments, Law, Forest Resources, Educational Outreach (Vice Provost), Social Work, and Dentistry and with the Chancellors of the Bothell and Tacoma Campuses.

Similar discussions were held with various individuals, teams and working groups, including the FIN PIT Team, the TOP 5 Financial Team, representatives from the Medical Centers and the School of Medicine, the Advancement Office, HR, Academic Personnel, Human Subjects, Risk Management, Health Sciences Administration, TechTransfer, Internal Audit, Office of the University Registrar, and Student Aid.

Although the majority of discussion with these individuals/groups was overwhelmingly in favor open financial data, several concerns were raised:

- **Names of clinical trial/research subjects paid through FAS are shown in the "transactions description" field.** In order to mitigate this risk, alternate business processes have been created so that this will not occur in the future. The transaction description field for historical records having this specific account code will be masked so that the names will not show.
- **Employee settlement payments also may have the recipient's name in the transaction description field.** Again, alternate processes were derived so that this will not occur in the future. It was determined that having these names in the current historical data is an acceptable risk.
- **Infrequently, patient names may also show in the transaction description field for such activities as NSF checks, expense reimbursements for cancelled services, etc.** These may occur for a number of different account codes, and there is no real way to determine if the name is of a patient or not. These occurrences were deemed to be an acceptable risk.
- **Student names and student IDs also show in the transaction description field for financial aid disbursements.** The Office of Student Aid and Office of the University Registrar had concerns that such information would violate the privacy of

the student. After some discussion, including consultation with the AG's Office, it was determined that this was an acceptable risk.

- **The recommendation was made that all UW employees accessing this data give an acknowledgement that they are aware of the duties and requirements associated with using this data appropriately as part of their duties.** It was agreed that such an acknowledgement will happen when a role to access this data is bestowed.

No other significant concerns were raised. All discussions ended with a clear agreement to move forward with the proposal.