



# CAMPUSCISO®

## IT POLICY FRAMEWORK

2026 Edition

# CampusCISO IT Policy Framework

2026 Edition

Chris Schreiber

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## **Also By Chris Schreiber**

Building IT Policy Programs for Higher Education

# Contents

- Preface . . . . . i**
- CampusCISO IT Policy Framework . . . . . 1**
  - Introduction . . . . . 1
  - How to Use This Framework Document . . . . . 2
  - Framework Structure . . . . . 3
  - Policy Inventory (17 Identified) . . . . . 4
  - Standards Inventory (24 Identified) . . . . . 7
  - Framework Alignment . . . . . 9
  - The Self-Assessment and Diagnostic Score . . . . . 10
- The Policy Inventory . . . . . 12**
  - Universal Policies (7) . . . . . 12
  - Common Policies (5) . . . . . 20
  - Emerging Policies (5) . . . . . 26
- The Standards Inventory . . . . . 32**
  - Universal Standards (11) . . . . . 32
  - Common Standards (9) . . . . . 44
  - Emerging Standards (4) . . . . . 54
- The 2026 Study: Methodology and Findings . . . . . 59**
  - Purpose . . . . . 59
  - Framework Design . . . . . 59
  - Institutional Tiers . . . . . 59
  - Sample and Visibility . . . . . 59
  - Prevalence Classification . . . . . 60
  - Scoring Methodology . . . . . 62
  - Aggregate Findings . . . . . 66
  - Limitations . . . . . 67
- CampusCISO IT Policy Self-Assessment . . . . . 68**
  - Purpose . . . . . 68
  - Scoring Key . . . . . 69
  - Section A: Policy Inventory . . . . . 69
  - Section B: Standards Inventory . . . . . 71

Section C: Sector-Wide Gap Coverage . . . . .	74
Section D: Governance Maturity . . . . .	75
Section E: Your Diagnostic Score . . . . .	77
Section F: Gap Priority Analysis . . . . .	78
Section G: Improvement Planning . . . . .	79
Next Steps . . . . .	80
<b>CampusCISO IT Policy Framework Edition History . . . . .</b>	<b>81</b>
2026 Edition . . . . .	81
Version 4.3 (December 2025) . . . . .	83
Edition History Summary . . . . .	84
Where to go from here . . . . .	84
Document Information . . . . .	86
<b>About CampusCISO . . . . .</b>	<b>87</b>

# Preface

Almost no technology leaders get excited at the prospect of reviewing and updating their IT policies. It's easier to put it off until next year. But this work is foundational to IT risk management, and because the work is so universally dreaded, I've watched what I call **Governance Debt** build up at institution after institution. This is the gap between the policies and standards an institution should have and the ones it actually maintains. This doesn't happen because anyone decided policy didn't matter. Instead, it happens because updating policies is the task everyone's happy to defer.

**When policies ARE updated, the work can be slow and frustrating.** Governance committees spend an hour wordsmithing a single clause, or debating whether it's really appropriate to enforce a standard requirement in an academic setting. The questions are fair, but without a shared picture of what a mature higher education IT policy program actually looks like, every one of them gets re-litigated from scratch. The effort drains energy before the committee reaches the decisions that matter.

After nearly three decades in higher education, I'd seen enough of this pattern to want a better solution. So I built this framework. I wanted to take the dread out of the process and give the sector something it didn't have: a shared, evidence-based picture of what a mature IT policy program contains, so those debates start from common ground instead of a blank page. It doesn't reflect one expert's preferences, and it isn't a generic control catalog written for another industry and retrofitted to campus needs.

This framework is a benchmark of what colleges and universities actually publish and what regulations and standards they reference in their published policy libraries. It draws on research across more than 400 institutions and catalogs the patterns in mature policies. An institution can use the included Self-Assessment to measure itself and quickly see where it stands.

That sums up the framework's job. It's part of a bigger mission. Boards, auditors, and insurers keep asking campus technology leaders the same three questions: do we have the right cybersecurity capabilities, the right policies, and the ability to execute? I created CampusCISO to help institutions answer all three, and to go further than a team can on their own. I've spent the past 5+ years building tools that help campus leaders compare their institution's cybersecurity against peers and track progress year over year. This framework is the starting point to shore up IT policies and standards, and it's something I wanted to be free for any institution to use.

For years, I applied this framework's components to support advisory client work. With the 2026 Edition, I'm publishing the full framework openly for the first time. It's free for any higher education institution or advisor to use, licensed under a Creative Commons license (CC BY-ND 4.0). That choice was deliberate. I built CampusCISO to make cybersecurity simpler and more defensible for the entire sector, not just for the institutions that hire me. Plus, a benchmark is more useful when everyone can measure themselves using the same process.

So use this as a tool to overcome your Governance Debt. Complete the Self-Assessment to score your policy library, then use it each year as your program matures to identify opportunities and track how far you've moved. If this resource makes the work a little less dreaded at even one institution, it will have done its job.

Chris Schreiber  
Founder, CampusCISO

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p.s. If you didn't get this book through [leanpub.com](http://leanpub.com), I recommend signing up for the free Community Edition. This is the first time I'm sharing the framework outside my advisory clients, and I anticipate publishing a few revisions as I get feedback. If you sign up with your email address, you'll automatically receive notifications as I publish these revisions.

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# CampusCISO IT Policy Framework

## Introduction

The CampusCISO IT Policy Framework (2026 Edition) is a benchmark of IT policy and governance practices in higher education. It's grounded in annual research that now spans 400+ colleges and universities.

This framework focuses on **IT governance maturity**: whether an institution has the right technology policies and standards in place. It does not assess operational security controls or technical vulnerabilities, which are addressed by other CampusCISO diagnostic instruments.

Behind that focus lies a harder question: what should a higher education IT policy program contain, and what should those policies actually say? Two common answers fall short. One is a single expert's opinion. The other is a generic blend of control frameworks and lists of best practices, none written specifically for higher education. This framework takes a third path. It answers the question with evidence, drawn not from any one framework but from the patterns that recur across the sector's actual practice.

Anyone who has spent time on a campus has seen paths worn into the grass where students take shortcuts instead of following the sidewalk. Urban planners call this phenomenon a "desire path," and they study it to understand where the official infrastructure failed to match where people actually wanted to go. The same observational approach shapes this framework. We map the desire paths of higher education IT policy, distinguishing between the Universal requirements found at nearly every major research university<sup>1</sup> and the Emerging practices that are still developing consensus.

Our research operates at two levels. At the **document level**, we identify which policies and standards higher education institutions publish. Those inform the inventory of 17 policies and 24 standards.

At the **element level**, we look inside those documents to see which specific details appear consistently across the sector. We then cross-reference what we observe with regulatory drivers and authoritative standards from NIST, ISO, NCSC<sup>2</sup>, and EDUCAUSE.

The framework, as defined in its inventory of policies and standards, is where peer practice, regulation, and authoritative guidance converge into a higher education reference model.

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<sup>1</sup>The 2026 Edition uses US R1 research universities as the operational definition of "large research university." To define the prevalence of specific policies and standards across higher education, we completed a census of large research institutions in the US. The framework is intentionally structured to support expansion to non-US institutions in future editions, where the reference group will include international equivalents to the US R1 institutions.

<sup>2</sup>UK National Cyber Security Centre, *Cyber Assessment Framework* (April 2024), <https://www.ncsc.gov.uk/collection/cyber-assessment-framework>.

This framework is a **maturity rubric, not a control catalog**. We identify which policy and standards topics higher education institutions actually document, without prescribing the specific controls within them.

The framework helps institutions move from reactive compliance work (audits, checklists, GRC cycles) toward continuous improvement of their IT policy programs. It provides the shared structural foundation that makes year-over-year improvement practical: validated topic guidance, prevalence-based classifications, and annual research that tracks how the sector evolves.

It complements control frameworks like NIST CSF, NIST SP 800-171, and ISO 27001 rather than replacing them. Control frameworks specify what technical safeguards to implement, while this framework shows what topics a mature IT policy program in higher education actually covers, and where an institution's program stands relative to peers.

## How to Use This Framework Document

- **Benchmark:** Comparing a policy library with a peer consensus to identify gaps.
- **Self-Assessment:** Using the included self-assessment to identify the institution's Diagnostic Score.
- **Prioritize:** Focusing political capital on "Universal" items first, which represent the sector's baseline for due diligence.
- **Implement:** Referring to the companion guide, *Building IT Policy Programs for Higher Education*, for rationale, drafting advice, and implementation strategies.

## Related Publications

The CampusCISO IT Policy product family includes additional resources that complement this framework. The companion guide, *Building IT Policy Programs for Higher Education* (2026 Edition), provides strategic context, regulatory analysis, drafting advice, and implementation strategies for building a complete IT policy program. For the full catalog of related resources, visit [campusciso.com/it-policy-guide](https://campusciso.com/it-policy-guide).

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## Framework Structure

The framework's structure mirrors how higher education institutions organize policy in practice. Two dimensions shape it: a **governance hierarchy** that distinguishes policies from standards by their place in an institution's authority structure, and a **prevalence** classification that reflects how widely each item is adopted across the sector. The inventories that follow are arranged by both.

### Governance Hierarchy

Mature institutions distinguish between policies, standards, procedures, and guidelines. This hierarchy assigns the right approval authority at each level: board-level policies change infrequently and require executive sign-off, while technical standards can be updated by IT leadership as threats evolve. Mixing these levels together creates either governance bottlenecks or gaps in oversight.

Level	Purpose	Approval	Updates
<b>Policy</b>	WHY - Management intent	Board/Cabinet	Infrequent
<b>Standard</b>	WHAT - Technical specifications	CIO/CISO	As needed
<b>Procedure</b>	HOW - Detailed instructions	Department	Frequent
<b>Guideline</b>	Advisory (not mandatory)	Department	As needed

### Prevalence Definitions

The annual research determines each item's classification by measuring its observed prevalence, and classifications shift between editions as sector practice evolves. Emerging items can move toward Common as adoption spreads. Common items can advance to Universal once they reach consensus. The Edition History documents how items have been reclassified across versions.

Level	Definition
<b>Universal</b>	Observed at ≥90% of Tier 1 institutions. Legally or operationally essential.
<b>Common</b>	Observed at 50-89% of Tier 1 institutions. Indicators of well-developed security programs.
<b>Emerging</b>	Observed at <50% of Tier 1 institutions.

## Policy Inventory (17 Identified)

These board-level policies establish management intent and risk tolerance, delegating implementation details to standards and procedures. Prevalence data reveals which policies are baseline expectations versus emerging areas where the sector is still developing consensus.

The framework groups higher education institutions into five institutional tiers based on Carnegie Classification to enable peer benchmarking. Prevalence figures in this section reflect Tier 1 institutions (R1 research universities) with full documentation visibility. For tier definitions and the scoring formula, see the Methodology and Findings chapter. Individual institutional requirements vary based on regulatory environment, mission, and risk tolerance.

Tier 1 institutions anchor the framework because their programs are the most fully developed and documented in the sector. That makes them its clearest reference point, but most of what the framework measures applies to an institution of any size or type. Only a handful of items are tied to a specific mission, such as sponsored research or international travel. Every institution is measured against that same yardstick, and one of any type can still demonstrate strong maturity. Where a smaller institution scores lower, that often reflects how completely it has documented its program, not whether the governance matters to it.

**About the reference codes:** P-01 through P-17 identify policies. S-01 through S-24 identify standards. These codes are fixed references. A policy or standard keeps the same number across framework editions even if its prevalence tier changes.

### Universal Policies (7)

Ref	Policy Name	Prevalence	What to Look For
P-02	Information Security Administration	94%	Delegates authority to CISO for security program, incident response, risk management
P-03	Acceptable Use of Information Technology	100%	Acceptable/prohibited uses, user responsibilities, enforcement framework
P-04	Data Handling and Classification	97%	Institutional data ownership, risk-based classification levels, baseline handling requirements

Ref	Policy Name	Prevalence	What to Look For
P-05	Privacy	97%	Legal obligations for personal information (FERPA <sup>3</sup> , GLBA <sup>4</sup> , state laws)
P-06	Incident Response	95%	Crisis management framework, breach notification procedures
P-07	IT Accessibility	91%	Digital accessibility (ADA <sup>5</sup> , Section 508 <sup>6</sup> , WCAG <sup>7</sup> )
P-09	Information Security	99%	Adopted security framework, program scope, principles, governance structure

## Common Policies (5)

Ref	Policy Name	Prevalence	What to Look For
P-01	Information Technology Administration	72%	Delegates authority to CIO for IT strategy, operations, resource management
P-08	Business Continuity / Disaster Recovery	73%	Institution-wide resilience planning, recovery requirements for critical systems
P-10	Data Governance	78%	Data ownership, stewardship, quality standards, lifecycle management
P-11	Research Data Management	79%	Federal sponsor compliance (CUI/CMMC <sup>8</sup> , EAR <sup>9</sup> , ITAR <sup>10</sup> ), builds on P-04. N/A if no sponsored research.
P-13	Third-Party Risk Management	76%	Vendor risk assessment, due diligence, ongoing monitoring requirements

<sup>3</sup>World Wide Web Consortium, "Web Content Accessibility Guidelines (WCAG) 2.2," October 2023, <https://www.w3.org/TR/WCAG22/>.

<sup>4</sup>U.S. General Services Administration, Section 508 of the Rehabilitation Act (29 U.S.C. § 794d), as amended (2018), <https://www.section508.gov/manage/laws-and-policies/>.

<sup>5</sup>Americans with Disabilities Act of 1990, Pub. L. 101-336 (1990), <https://www.ada.gov/law-and-regs/ada/>.

<sup>6</sup>Federal Trade Commission, Standards for Safeguarding Customer Information (Safeguards Rule) (2023), <https://www.ecfr.gov/current/title-16/chapter-I/subchapter-C/part-314>.

<sup>7</sup>Family Educational Rights and Privacy Act (FERPA) (1974), <https://www.ecfr.gov/current/title-34/subtitle-A/part-99>.

## Emerging Policies (5)

Ref	Policy Name	Prevalence	What to Look For
P-12	AI Governance	47%	Responsible AI use, data protection, bias awareness, academic integrity
P-14	Digital Presence / Web Governance	9%	Domain management, web content standards, institutional digital presence
P-15	Copyright Compliance / DMCA	5%	HEOA <sup>11</sup> compliance, Digital Millennium Copyright Act (DMCA) <sup>12</sup> response, P2P governance
P-16	Identity Theft Prevention	11%	FTC Red Flags Rule <sup>13</sup> , identity theft detection and response
P-17	Institutional Access to Electronic Information	5%	Access to user accounts/communications, legal holds, privacy boundaries

<sup>8</sup>U.S. Department of State, Directorate of Defense Trade Controls, *International Traffic in Arms Regulations (ITAR)*, <https://www.state.gov/bureaus-offices/under-secretary-for-arms-control-and-international-security-affairs/bureau-of-political-military-affairs/directorate-of-defense-trade-controls-pm-ddtc>.

<sup>9</sup>U.S. Bureau of Industry and Security, *Export Administration Regulations (EAR)*, <https://www.bis.gov/regulations/ear>.

<sup>10</sup>U.S. Department of Defense, *Cybersecurity Maturity Model Certification (CMMC) Program (2024)*, <https://dodcio.defense.gov/CMMC/>.

<sup>11</sup>Federal Trade Commission, *Identity Theft Red Flags and Address Discrepancies Under the Fair and Accurate Credit Transactions Act of 2003 (2024)*, <https://www.ecfr.gov/current/title-16/chapter-I/subchapter-F/part-681>.

<sup>12</sup>Digital Millennium Copyright Act, Pub. L. 105-304 (1998), <https://www.congress.gov/bill/105th-congress/house-bill/2281>.

<sup>13</sup>Higher Education Opportunity Act, Pub. L. 110-315 (2008), <https://www.congress.gov/bill/110th-congress/house-bill/4137>.

## Standards Inventory (24 Identified)

Standards translate policy intent into technical specifications. While policies establish that data must be protected, standards specify encryption algorithms, password complexity requirements, and patch timelines. These standards represent the technical control areas most commonly documented at higher education institutions.

Prevalence figures in this section also reflect Tier 1 institutions with full documentation visibility.

### Universal Standards (11)

Ref	Standard Name	Prevalence	What to Look For
S-01	Secure Configuration	92%	Baseline configs for OS, applications, network devices
S-02	Encryption	98%	Data at rest/in transit, approved algorithms, key management
S-03	Password and Authentication	100%	Password complexity, MFA, passwordless requirements
S-04	Network Security	96%	Firewall rules, segmentation, boundary protection, monitoring
S-05	Patch and Vulnerability Management	96%	Scanning frequency, patch timelines, remediation SLAs
S-06	Access Control and Identity Management	99%	Identity lifecycle, privileged access, authorization frameworks
S-07	Remote Access	95%	VPN requirements, remote desktop security
S-09	Security Monitoring and Logging	94%	Log retention, SIEM requirements, event analysis
S-10	Data Retention and Disposal	97%	Retention schedules, secure deletion, destruction certificates
S-13	Server and Endpoint Management	95%	Server hardening, endpoint protection
S-19	Personnel Security	93%	Background checks, training, termination procedures

## Common Standards (9)

Ref	Standard Name	Prevalence	What to Look For
S-08	Backup and Recovery	84%	Backup frequency, retention, recovery testing, off-site storage
S-11	Cloud Computing Security	81%	Cloud evaluation, configuration, shared responsibility model
S-12	Mobile Device Security	87%	University/personal device management, remote wipe
S-14	Wireless Network Security	85%	WPA3, guest isolation, rogue AP detection
S-15	Change Management	55%	Change approval, testing, rollback procedures
S-16	Physical Security of IT Assets	77%	Data center access, equipment disposal, clean desk
S-17	Software Licensing and Installation	73%	Approved software, license compliance, prohibited apps
S-18	Email Security	88%	Spam filtering, phishing protection, encryption
S-21	Ransomware Response Procedures	57%	Detection, containment, recovery, communication

## Emerging Standards (4)

Ref	Standard Name	Prevalence	What to Look For
S-20	Zero Trust Architecture	7%	Identity verification, least privilege, micro-segmentation
S-22	IoT / Connected Device Security	23%	Device inventory, isolation, firmware updates
S-23	Security Exception Management	7%	Policy deviation requests, risk acceptance, waiver procedures
S-24	International Travel Security	6%	Device/data protection abroad, loaner devices, high-risk countries

## Framework Alignment

Explicit alignment to an established cybersecurity framework strengthens an institution's security program by providing structured guidance, enabling peer comparison, and demonstrating due diligence to auditors and insurers.

Which framework an institution chooses depends on context. For example, research institutions with federal contracts often require NIST alignment, while institutions seeking international partnerships may benefit from ISO certification.

Framework	Best For
NIST CSF 2.0 <sup>14</sup>	Most institutions; strategic communication with leadership
NIST SP 800-53 <sup>15</sup>	Detailed control implementation; federal compliance mapping
NIST SP 800-171 (Rev 2/Rev 3) <sup>16 17</sup>	Institutions handling CUI, from DoD research to federal student aid tax information (CMMC requires Rev 2; ED and other federal programs transitioning to Rev 3)
CISA Cross-Sector CPGs 2.0 <sup>18</sup>	Resource-constrained institutions; prioritized baseline of high-impact practices
ISO 27001/27002 <sup>19</sup>	International partnerships; certification requirements
Cyber Essentials <sup>20</sup>	UK partnerships and lean institutions; certifiable baseline of five technical controls

## Example Approaches to Policy Structure

Institutions organize their policy and standards libraries in different ways, and no single structure is required. The examples below range from strict mapping to one NIST control set, to consolidated libraries that hold policy and standard content together, to custom controls catalogs. Each institution publishes its structure openly.

<sup>14</sup>UK National Cyber Security Centre, *Cyber Essentials*, <https://www.ncsc.gov.uk/cyberessentials/overview>.

<sup>15</sup>International Organization for Standardization, *ISO/IEC 27001:2022 Information Security, Cybersecurity and Privacy Protection – Information Security Management Systems – Requirements* (2022), <https://www.iso.org/standard/27001>.

<sup>16</sup>Cybersecurity and Infrastructure Security Agency, *Cross-Sector Cybersecurity Performance Goals, Version 2.0* (December 2025), <https://www.cisa.gov/cross-sector-cybersecurity-performance-goals>.

<sup>17</sup>National Institute of Standards and Technology, *Protecting Controlled Unclassified Information in Nonfederal Systems and Organizations, Revision 3* (May 2024), <https://csrc.nist.gov/pubs/sp/800/171/r3/final>.

<sup>18</sup>National Institute of Standards and Technology, *Protecting Controlled Unclassified Information in Nonfederal Systems and Organizations, Revision 2* (February 2020), <https://csrc.nist.gov/publications/detail/sp/800-171/rev-2/final>.

<sup>19</sup>National Institute of Standards and Technology, *Security and Privacy Controls for Information Systems and Organizations* (September 2020), <https://csrc.nist.gov/publications/detail/sp/800-53/rev-5/final>.

<sup>20</sup>National Institute of Standards and Technology, *NIST Cybersecurity Framework 2.0* (February 2024), <https://www.nist.gov/cyberframework>.

<b>Institution</b>	<b>Notable Characteristics</b>
Indiana University <sup>21</sup>	Pure NIST 800-53 alignment, 16 standards mapped to control families
Wisconsin-Madison <sup>22</sup>	30+ numbered IT policies in a single library covering both policy and standard content
Penn State <sup>23</sup>	14 security standards, CISO Advisory Committee
Texas A&M <sup>24</sup>	21-family Controls Catalog with DIR/NIST alignment
University of Florida <sup>25</sup>	Archer-based CSF maturity assessment
UNC Chapel Hill <sup>26</sup>	Multi-control-family MSS with OWASP ASVS

## The Self-Assessment and Diagnostic Score

The framework includes a self-assessment that produces a single **Diagnostic Score** from 0 to 100. The score is designed to gauge an institution's policy and governance maturity relative to the sector, without requiring the institution to adopt or map to any particular control framework.

Cybersecurity programs in higher education vary widely in which frameworks they follow and how they document their controls. Rather than measuring an institution against the specifics of NIST, ISO, or any single standard, the Diagnostic Score looks for the macro patterns that signal a mature policy program: whether the right topics are documented, whether governance roles and approval authorities are clear, and whether standards translate policy intent into technical specifications. Measuring at that level normalizes the variation across the sector into one consistent score, which supports two kinds of comparison: an institution against its peers, and an institution against itself over time.

<b>Level</b>	<b>Score</b>	<b>Interpretation</b>
<b>Mature</b>	80-100	Comprehensive coverage, established governance
<b>Developing</b>	50-79	Good coverage, most elements adequate
<b>Foundational</b>	25-49	Basic coverage, governance exists
<b>Minimal</b>	0-24	Limited coverage, significant gaps

<sup>21</sup>University of North Carolina at Chapel Hill, "Information Security Controls Standard (Minimum Security Standard)," 2025, <https://policies.unc.edu/TDClient/2833/Portal/KB/?CategoryID=25084>.

<sup>22</sup>University of Florida, "UF Cybersecurity Framework (CSF) Maturity Assessment," 2024, <https://it.ufl.edu/security/security-guidance/uf-cybersecurity-framework-csf/>.

<sup>23</sup>Texas A&M University, "Information Security Controls Catalog," 2024, <https://it.tamu.edu/policy/it-policy/controls-catalog/index.php>.

<sup>24</sup>The Pennsylvania State University, "Information Assurance and IT Security (AD95): Policies and Standards," 2024, <https://security.psu.edu/awareness/>.

<sup>25</sup>University of Wisconsin-Madison, "UW-Madison Policy Library: Information Technology Policies," 2025, <https://policy.wisc.edu/>.

<sup>26</sup>Indiana University, "IT-12 Security Standards," 2024, <https://informationsecurity.iu.edu/policies/standards/index.html>.

**The Diagnostic Score measures governance architecture, not operational effectiveness.** A high score indicates comprehensive, current documentation. It does not indicate whether controls are tested, enforced, or effective in practice.

The self-assessment worksheet and its scoring formulas appear in Appendix A. A printable PDF version is available as a download with this book and with the companion guide, *Building IT Policy Programs for Higher Education*.

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# The Policy Inventory

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## Universal Policies (7)

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### **P-03: Acceptable Use of Information Technology**

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#### **Applicability**

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#### **Key Elements**

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#### **Common Variations**

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#### **Regulatory Drivers**

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#### **Framework Alignment**

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#### **Related Policies and Standards**

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#### **Failure Mode**

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## **P-04: Data Handling and Classification**

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### **Adoption Prevalence**

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### **Framework Alignment**

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### **Related Policies and Standards**

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### **Failure Mode**

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**P-05: Privacy**

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**Adoption Prevalence**

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**Failure Mode**

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## **P-06: Incident Response**

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### **Adoption Prevalence**

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**P-07: IT Accessibility**

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**Adoption Prevalence**

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**Failure Mode**

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## **P-09: Information Security**

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### **Adoption Prevalence**

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### **Failure Mode**

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## Common Policies (5)

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## **P-01: Information Technology Administration**

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### **Adoption Prevalence**

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### **Related Policies and Standards**

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### **Failure Mode**

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## **P-08: Business Continuity and Disaster Recovery**

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### **Adoption Prevalence**

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### **Framework Alignment**

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### **Failure Mode**

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## **P-10: Data Governance**

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### **Adoption Prevalence**

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### **Failure Mode**

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## **P-11: Research Data Management**

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### **Adoption Prevalence**

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## **P-13: Third-Party Risk Management**

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## Emerging Policies (5)

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## **P-12: AI Governance**

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### **Adoption Prevalence**

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### **Common Variations**

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### **Regulatory Drivers**

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### **Framework Alignment**

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### **Related Policies and Standards**

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### **Failure Mode**

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## **P-14: Digital Presence and Web Governance**

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### **Adoption Prevalence**

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### **Primary Owner**

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### **Failure Mode**

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## **P-15: Copyright Compliance and DMCA**

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### **Adoption Prevalence**

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## **P-16: Identity Theft Prevention**

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### **Adoption Prevalence**

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## **P-17: Institutional Access to Electronic Information**

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# The Standards Inventory

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## Universal Standards (11)

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## **S-01: Secure Configuration**

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### **Adoption Prevalence**

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## **S-02: Encryption**

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### **S-03: Password and Authentication**

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#### **Adoption Prevalence**

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## **S-04: Network Security**

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### **Adoption Prevalence**

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## **S-05: Patch and Vulnerability Management**

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## **S-06: Access Control and Identity Management**

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**S-07: Remote Access**

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**Related Policies and Standards**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

**Failure Mode**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## **S-09: Security Monitoring and Logging**

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### **Adoption Prevalence**

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### **Primary Owner**

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### **Applicability**

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### **Key Elements**

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### **Common Variations**

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### **Regulatory Drivers**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### **Framework Alignment**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### **Related Policies and Standards**

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### **Failure Mode**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## **S-10: Data Retention and Disposal**

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### **Adoption Prevalence**

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### **Primary Owner**

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### **Regulatory Drivers**

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### **Framework Alignment**

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### **Related Policies and Standards**

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### **Failure Mode**

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## **S-13: Server and Endpoint Management**

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### **Adoption Prevalence**

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### **Related Policies and Standards**

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### **Failure Mode**

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## **S-19: Personnel Security**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### **Adoption Prevalence**

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### **Primary Owner**

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### **Key Elements**

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### **Regulatory Drivers**

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### **Framework Alignment**

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### **Related Policies and Standards**

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### **Failure Mode**

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## Common Standards (9)

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## **S-08: Backup and Recovery**

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### **Adoption Prevalence**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### **Primary Owner**

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### **Related Policies and Standards**

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### **Failure Mode**

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## **S-11: Cloud Computing Security**

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### **Adoption Prevalence**

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### **Primary Owner**

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### **Key Elements**

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### **Framework Alignment**

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### **Related Policies and Standards**

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### **Failure Mode**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## S-12: Mobile Device Security

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### Adoption Prevalence

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### Primary Owner

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### Applicability

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### Key Elements

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### Common Variations

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### Regulatory Drivers

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### Framework Alignment

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### Related Policies and Standards

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### Failure Mode

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## **S-14: Wireless Network Security**

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### **Adoption Prevalence**

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### **Primary Owner**

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### **Framework Alignment**

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### **Failure Mode**

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## **S-15: Change Management**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### **Adoption Prevalence**

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### **Failure Mode**

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## **S-16: Physical Security of IT Assets**

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### **Adoption Prevalence**

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### **Failure Mode**

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## **S-17: Software Licensing and Installation**

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### **Adoption Prevalence**

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### **Failure Mode**

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## **S-18: Email Security**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### **Adoption Prevalence**

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### **Primary Owner**

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### **Applicability**

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### **Key Elements**

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### **Common Variations**

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### **Regulatory Drivers**

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### **Framework Alignment**

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### **Related Policies and Standards**

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### **Failure Mode**

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## **S-21: Ransomware Response Procedures**

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### **Adoption Prevalence**

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### **Primary Owner**

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### **Applicability**

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### **Key Elements**

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### **Common Variations**

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### **Regulatory Drivers**

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### **Framework Alignment**

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### **Related Policies and Standards**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### **Failure Mode**

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## Emerging Standards (4)

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## **S-20: Zero Trust Architecture**

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### **Adoption Prevalence**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### **Primary Owner**

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### **Applicability**

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### **Key Elements**

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### **Common Variations**

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### **Regulatory Drivers**

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### **Framework Alignment**

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### **Related Policies and Standards**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### **Failure Mode**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## **S-22: IoT and Connected Device Security**

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### **Adoption Prevalence**

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### **Primary Owner**

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### **Applicability**

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### **Key Elements**

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### **Common Variations**

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### **Regulatory Drivers**

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### **Framework Alignment**

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### **Related Policies and Standards**

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### **Failure Mode**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## **S-23: Security Exception Management**

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### **Adoption Prevalence**

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### **Primary Owner**

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### **Key Elements**

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### **Regulatory Drivers**

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### **Framework Alignment**

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### **Related Policies and Standards**

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### **Failure Mode**

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## **S-24: International Travel Security**

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### **Adoption Prevalence**

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### **Primary Owner**

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### **Framework Alignment**

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### **Failure Mode**

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# The 2026 Study: Methodology and Findings

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## Purpose

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## Framework Design

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## Institutional Tiers

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## Sample and Visibility

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## Sample Composition

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## Documentation Visibility

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## **Visibility by Tier**

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## **Prevalence Classification**

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## **Reporting Prevalence with Limited Visibility**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## **Precision of Prevalence Figures**

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## Scoring Methodology

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## Quantitative Score (60 points)

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## Sector-Wide Gap Coverage

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## **Qualitative Score (40 points)**

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## **Governance Architecture**

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### **Framework Alignment**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### **Standards Inventory**

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### **Risk-Tiered Compliance**

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### **Centralized Coordination**

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### **Maturity Levels**

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## **Aggregate Findings**

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### **Diagnostic Score Distribution at Tier 1**

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### **Diagnostic Scores Across Tiers**

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### **Notable Patterns**

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## Limitations

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# CampusCISO IT Policy Self-Assessment

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## Purpose

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## Scoring Key

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## Section A: Policy Inventory

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### A.1: Universal Policies (7 items)

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### A.2: Common Policies (5 items)

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

**A.3: Emerging Policies (5 items)**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

**A.4: Policy Totals**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## Section B: Standards Inventory

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### B.1: Universal Standards (11 items)

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

**B.2: Common Standards (9 items)**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

**B.3: Emerging Standards (4 items)**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## **B.4: Standards Totals**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## Section C: Sector-Wide Gap Coverage

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## Section D: Governance Maturity

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### D.1: Governance Architecture

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### D.2: Framework Alignment

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### D.3: Standards Inventory

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### D.4: Risk-Tiered Compliance

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## **D.5: Centralized Coordination**

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

## **D.6: Governance Maturity Total**

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## Section E: Your Diagnostic Score

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### E.1: Quantitative Score (60 points maximum)

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### E.2: Qualitative Score (40 points maximum)

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### E.3: Diagnostic Score

This content is not available in the sample book. The book can be purchased on Leanpub at [https://leanpub.com/campusciso\\_it\\_policy\\_framework](https://leanpub.com/campusciso_it_policy_framework).

### E.4: Maturity Level Determination

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## Section F: Gap Priority Analysis

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### F.1: Critical Gap Indicators

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### F.2: Component Analysis

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### F.3: Regulatory Load Verification

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## Section G: Improvement Planning

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## Next Steps

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# CampusCISO IT Policy Framework Edition History

The framework is designed to evolve. Each year's research measures observed practice across the sector, identifies items that may belong in the inventory, and adjusts classifications as adoption shifts. This appendix shows what changed between editions and why.

Throughout this document, prevalence figures reflect Tier 1 institutions with full documentation visibility. See the Methodology and Findings chapter.

## 2026 Edition

### Summary

The 2026 Edition expands policy coverage from 13 to 17 items and standards coverage from 22 to 24 items, based on patterns identified in the 2026 CampusCISO IT Policy Study. Several items were reclassified based on updated prevalence data.

### New Policies (4)

<b>Ref</b>	<b>Policy</b>	<b>Rationale</b>
P-14	Digital Presence / Web Governance	Observed at 9%; emerging governance area for domain management and institutional web presence
P-15	Copyright Compliance / DMCA	HEOA compliance requirement; observed at 5% as standalone policy
P-16	Identity Theft Prevention	FTC Red Flags Rule requirement; only 11% despite legal mandate
P-17	Institutional Access to Electronic Information	Privacy boundary policy for access to user accounts/communications; observed at 5%

## New Standards (2)

Ref	Standard	Rationale
S-23	Security Exception Management	Formal waiver/deviation processes observed at 7%; critical for governance maturity
S-24	International Travel Security	NSPM-33 and CHIPS Act requirements; only 6% despite research security imperative

## Reclassifications

### Upgraded (prevalence increased or importance elevated):

Ref	Item	From	To	Rationale
P-09	Information Security	Common	Universal	Observed at 99% in 2026 study
P-13	Third-Party Risk Management	Emerging	Common	Observed at 76%; sector maturation
S-13	Server and Endpoint Management	Common	Universal	Observed at 95%
S-19	Personnel Security	Common	Universal	Observed at 93%
S-21	Ransomware Response Procedures	Emerging	Common	Observed at 57%; threat-driven adoption

### Downgraded (prevalence decreased or measurement refined):

Ref	Item	From	To	Rationale
P-01	Information Technology Administration	Universal	Common	Observed at 72%; v4.3 figure reflected smaller sample
S-08	Backup and Recovery	Universal	Common	Observed at 84% in expanded sample; v4.3 figure reflected smaller sample

## Sector-Wide Gaps Updates

### Added:

- Identity Theft Prevention (FTC Red Flags Rule required, observed at 11%)
- International Travel Security (NSPM-33/CHIPS Act imperative, observed at 6%)

## Methodology Changes

- Expanded sample from Tier 1 only to 410 institutions across all institutional tiers
- Introduced the 60% visibility threshold. Tiers below the threshold use visibility-limited labels (High/Mixed/Low) instead of percentages
- Standardized margin of error reporting to a single  $\pm 4\%$  figure based on the standards Visible Sample (n=142)
- Revised quantitative scoring weights. Removed 5 points from Universal Policies and Universal Standards, and increased Total Policies and Total Standards weights from 5 to 10. The change maintains the 60-point maximum while giving additional credit to maintaining a comprehensive policy library.

## Version 4.3 (December 2025)

Framework 4.3 was the production version used during the R1 census phase of completing the 2026 CampusCISO IT Policy Study. It established the 13-policy, 22-standard structure that formed the baseline for the 2026 Edition.

Key characteristics:

- 13 policies (7 Universal, 4 Common, 2 Emerging)
- 22 standards (11 Universal, 8 Common, 3 Emerging)
- 5 Sector-Wide Gaps
- R1-only prevalence data

## Edition History Summary

Version	Date	Policies	Standards	Sample Size	Key Changes
2026 Edition (v5.0)	May 2026	17	24	410 (all tiers)	Multi-tier expansion, 4 new policies, 2 new standards
v4.3	Dec 2025	13	22	187 (R1 only)	R1 census completion
v4.2	Nov 2025	13	22	150 (R1 only)	Maturity boundary adjustments
v4.0	Oct 2025	13	22	100 (R1 only)	Framework restructure
v3.x	2024	11	18	50 (R1 only)	Initial empirical validation

The 2026 Edition is the first publicly released framework. Earlier version numbers (v3.x through v4.3) reflect internal development milestones during the framework’s empirical validation period. Intermediate versions not shown (including v4.1) were internal builds with no structural impact on the published framework.

\* \* \*

## Where to go from here

Policy work can be tackled internally or with outside support. The CampusCISO offerings below map to a range of institutional needs.

**Start with this framework.** The CampusCISO IT Policy Framework, updated annually, is freely available at [campusciso.com/it-policy-guide](https://campusciso.com/it-policy-guide). The Community Edition is the foundation that all other CampusCISO IT Policy offerings build on. Institutions can use it on its own as a reference for self-directed work.

**Build it with the guide.** *Building IT Policy Programs for Higher Education* interprets the framework. It includes a light assessment workflow and a structured approach to building a development roadmap. An institution with the staff capacity and the patience will find everything it needs in the book to build a defensible IT policy improvement cycle.

**Get a baseline diagnostic.** The IT Policy Diagnostic delivers a 0-100 score and a prioritized gap list within two business days. It’s the fastest way to answer the question, “Where do we actually

stand?”, with evidence to bring to leadership. Useful for new CISOs in their first 90 days, programs preparing for audit, and any institution that wants a defensible baseline without committing to a larger engagement.

**Get a development roadmap.** The IT Policy Roadmap provides a detailed review of every policy in an institution’s portfolio, peer benchmarking, and a sequenced development plan weighted by impact, cost, complexity, and regulatory support. Ideal for institutions that want to identify defensible improvement priorities.

**Make it ongoing.** CampusCISO membership turns governance from a one-time project into a continuous improvement cycle with ongoing access to expert advisory support.

For the full service catalog, visit [campusciso.com](https://campusciso.com).

## Document Information

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# About CampusCISO

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## Contact

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