



Date: July 12, 2018

From: Joe Voje  
Chief Information Security Officer

Re: Verification of OHSU Compliance with the Federal Information Security Management Act of 2002

Information Privacy and Security Office

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### Purpose

The purpose of this memorandum is to communicate OHSU's enterprise security control baselines with regard to FISMA. Although OHSU is not a federal agency and, therefore, not explicitly subject to FISMA, we have undertaken an evaluation of our existing information privacy and security program versus the standards defined in National Institute for Standards and Technology (NIST) Special Publication 800-53, Revision 4 (<http://csrc.nist.gov/publications/nistpubs/>).

### Conclusions

1. OHSU's information security controls for enterprise information systems meet the control baselines for low-impact systems as detailed in *Recommended Security Controls for Federal Information Systems, Low-Impact Baseline* NIST Special Publication 800-53, Revision 4, Annex 1 (<http://csrc.nist.gov/publications/nistpubs/>).
2. Some of the specific controls specified in the low baseline are exceeded by OHSU due to our own risk management decisions (which are made based on criteria beyond the scope of FISMA). In these instances, specific controls often meet the standard for moderate-impact or high-impact systems.
3. These conclusions apply to OHSU enterprise-managed systems. OHSU users who receive, create or maintain electronic information are responsible for ensuring that the information is stored only in systems that provide appropriate security controls. For non-enterprise-managed systems (e.g., departmental servers, removable storage devices, standalone laptops and other portable media), the Steward of these systems will need to be individually consulted to verify control baselines.

Further clarification can be obtained by contacting OHSU's Information Privacy and Security Office at [oips@ohsu.edu](mailto:oips@ohsu.edu) or 503-494-0219.