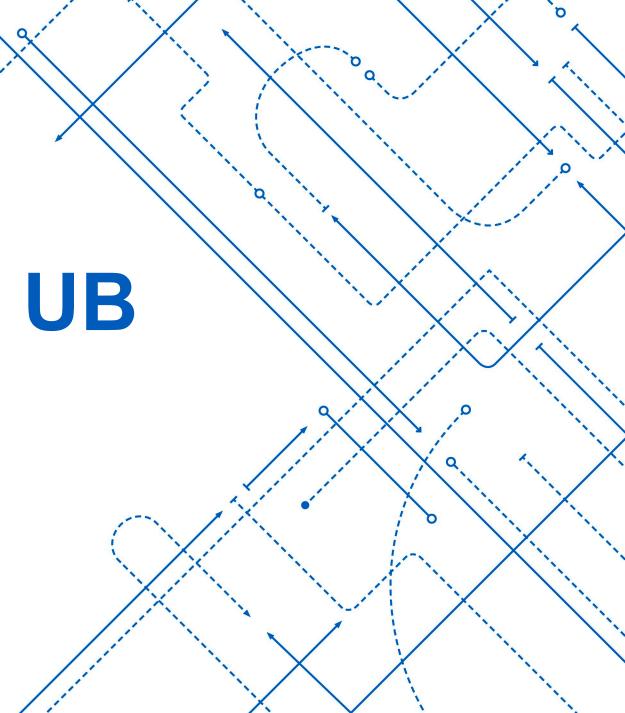
IT POLICIES AT UB

Tina Rimbeck, Senior Information Security Compliance Analyst





Policy as a Function of the Information Security Office

The Information Security Office incorporated the IT Policy Office in Fall 2023 to:

- Improve UB's security posture
- Streamline policy and processes related to IT security
- Respond to a complex and rapidly changing regulatory environment
- Adapt to swiftly emerging threats

This consolidation enables UBIT to maintain consistent and robust security policies and processes aligned with regulatory requirements and industry best practices.



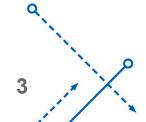
The Structure of IT Policies at UB

University Policies:

- Set the tone for IT governance and compliance.
 - <u>Examples:</u> <u>Website Privacy Policy;</u>
 <u>Computer and Network Use Policy.</u>

IT Policies:

- Focus on technology-related matters.
- Provide detailed guidelines for IT practices.
 - <u>Examples</u>: <u>Use of Software Applications at UB</u>;
 <u>Log Data Access and Retention Policy</u>



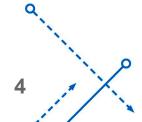
The Structure of IT Policies at UB

IT Standards:

- Define technical requirements.
- Ensure consistency across UB's IT infrastructure.
 - Example: Minimum Security Standards for Desktops, Laptops, Mobile, and Other Endpoint Devices.

IT Guidance Documents:

- Outlines IT best practices and supports existing policies.
- Guide distributed IT, faculty, and staff.
 - Example: <u>Guidelines for Classroom Recording</u>;
 <u>UBIT Guidance: Using Generative Artificial Intelligence (AI) Technology at the University at Buffalo</u>

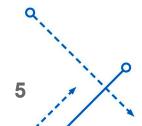


Strategy for Policy Updates

Policies are reviewed every three years, or more frequently as circumstances require. A comprehensive policy review is needed to determine if:

- The purpose and goal of the policy is still being met
- There are any new mandates (e.g., state or federal law changes) that require a policy change
- Changes have occurred in best practices, customer needs, university culture or social trends
- Changes are needed to improve effectiveness or clarify the policy or procedures
- The policy can be integrated with or addressed by other policies, rules or documents
- Terminology, contact information, websites and related links are current and correct
- The appropriate training and education is occurring
- The policy is still needed

When changes are needed, the policy writer follows the process to revise the policies, as necessary.



Steps for Advancing a Policy at UB

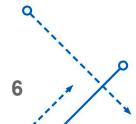
The process for approving policies at the University at Buffalo (UB) involves several steps to ensure thoroughness and compliance. This rigorous process ensures that all UB's IT policies are well-informed, compliant with State and Federal regulations, and reflective of UB's commitment to effective IT governance.

1. Stakeholder Engagement:

 Policy writers collaborate with appropriate stakeholders and IT directors to obtain the essential background information for policy creation.

2. Research and Drafting:

 Policy writers meticulously research and draft new or revised policies, standards, and guidance documents to ensure UB's compliance with relevant state and federal laws.



Steps for Advancing a Policy at UB

3. Initial Review:

- The draft policy undergoes review by the Directors of Distributed IT and the Information Security and Privacy Advisory Committee (ISPAC).
- Feedback from these experts informs necessary revisions.

4. IT Director Approval:

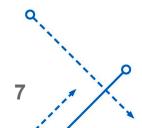
- The revised policy is sent to the IT director who requested it.
- If satisfied, the IT director signs off on the policy.

5. CIO Approval:

- The policy then proceeds to the Chief Information Officer (CIO) for final approval.
- The CIO ensures alignment with UB's strategic goals and overall IT framework.

6. Campus Communication

- The approved policy is sent to IT Communications to publish.
- The CIO sends an email notifying the campus community of the new policy.



Additional Steps for Approving University Policies:

- 1. If the policy is a university-wide policy, it undergoes further scrutiny including reviews by:
 - The University Office of Policy, Compliance, and Internal Controls
 - The University Policy Review Committee

2. Community Review:

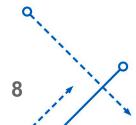
- Once a policy passes the University Policy Review Committee it enters a <u>30-day review</u> period for UB community members.
- Feedback received during this time informs any necessary revisions.

3. Legal Review:

 Following the 30-day review the University Office of Policy, Compliance, and Internal Controls sends the policy to university legal counsel for review.

4. Presidential Approval:

If no significant feedback is received, the policy proceeds to Presidential approval.





Recent Policy Changes

New Policies, Standards & Guidance Documents

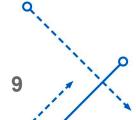
- <u>UBIT Guidance: Understanding Website Privacy for University Sites</u> (Est. 8/9/24)
- University at Buffalo Information Security Program (Est. 3/26/24)
- <u>UBIT Guidance: Using Generative Artificial Intelligence (AI) Technology at the University at Buffalo</u> (Est. 1/2/24)

Revised Policies Standards & Guidance Documents

- <u>Data Access Policy</u> (Updated 9/10/24)
- Guidelines for Classroom Recording (Updated 8/6/24)
- Website Privacy Policy (Updated 7/22/24)
- Guidance for UB Gramm-Leach-Bliley Act Compliance (Updated 7/3/24)

Retired Policies Standards & Guidance Documents

Wi-Fi COVID-Proximity Dashboard (Retired February 28, 2024)



Upcoming Policies, Standards & Guidance Documents

Revised Policies, Standards & Guidance Documents

In addition to these policies, standards and guidance the IT policy office is in the process of revising and drafting several policies, standards and guidance documents to ensure the university is compliant with:

- GLBA
- HIPAA
- NIST 800-171
- SUNY 6900



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