CUNYfirst Non-Public University Information Data Access Waiver Procedure

The CUNY IT Security Procedures require that when a student, temporary employee or consultant requests access to CUNY non-public university information (or to systems that provide such access, i.e., for CUNYfirst, access beyond the automatically assigned, base role defaults), and for whom the limited exceptions detailed in the Procedures do not apply, the following data access waiver procedure is required in addition to the normal CUNYfirst access forms and procedures.

This additional approval requirement increases visibility, oversight and accountability by the requestor, the requestor’s supervisor and college senior administrative management to emphasize the potential for conflict of interest and increased general risk associated with providing such access to these cohorts.

Procedure

1. Requestor must fill out the waiver form below and obtain all required signatures. The most recent version of the form is available at security.cuny.edu.

2. Per the Procedures, waivers are valid for a maximum of one year and must be renewed if ongoing access is required.

3. The form should be scanned to a PDF format document and emailed to security@cuny.edu. It is helpful to include the associated application access forms (e.g., CUNYfirst) to provide context on the type of access being requested.

4. Waiver review and acceptance is nominally completed in five business days or less. Acceptance may take longer if inquiries and/or clarifications are required.

5. If accepted, the signed waiver will be emailed back to the sender.

6. The fully signed and accepted waiver form must be retained with other access approval documentation (e.g., attached to a ticket) or in an equivalent manner acceptable to the Vice President of Administration or equivalent at the college.

7. If a waiver is required and none is provided, the ASL must defer/reject the associated access request until an approved waiver is provided. The ASL should provide information about the waiver requirement to requestors as necessary but has no responsibility to facilitate waiver completion or solicit approval signatures on behalf of a requestor.

8. Waivers are subject to both internal and external audits, and missing or expired waivers can result in adverse audit findings and other undesirable outcomes.
3. Access to University Information

(c) Employees Requiring Waiver. Employees of the University or its related entities who are not full-time and regular part-time employees (e.g., individuals hired as part of a temporary staff augmentation or in connection with an individual project), University adjunct faculty, or employees of the University's contractors who have been permitted access to Non-Public University Information under a written agreement with the University may not be permitted any such access, except pursuant to the waiver procedure set forth in section 3(e) below.

(d) CUNY Students. CUNY Students may not be permitted any access to Non-Public University Information, except pursuant to the waiver procedure set forth in section 3(e) below. For the purpose of these IT Security Procedures, “CUNY Students” means all students enrolled in any academic program, or taking any course or courses, at the University, except the following:

(i) students who are also University adjunct faculty,
(ii) employees of the University or its related entities or contractors who are taking a Continuing Education course at the University,
(iii) employees of the University or its related entities or contractors who are taking a credit-bearing course at a College other than where they are employed, and
(iv) employees of the University or its related entities who are taking a credit bearing course at the College where they are employed, provided they are taking the course pursuant to a tuition waiver program under a collective bargaining agreement, or are excluded from collective bargaining and are taking the course under a University tuition waiver policy.

(e) Waiver Procedure. An individual who is not permitted access to Non-Public University Information under sections 3(c) and (d) above may be permitted such access on a strict need to know basis, consistent with the individual’s job responsibilities, but only if a waiver is granted by the University Chief Information Officer or his designee following a written request by the Vice President of Administration or equivalent at the College or in the Central Office department involved. Any waiver granted will be limited to a specific period of time, which may not exceed one year. In order to extend the waiver after expiration, this waiver procedure must be repeated. The written waiver request must state:

- the specific status of the individual as an employee of the University or one of its related entities or contractors and/or as a CUNY Student,
- the type and form of access that is being requested,
- the length of time for which access is being requested,
- the reasons for permitting such access, and
- how and by whom the individual will be supervised.

The Vice President of Administration or equivalent at the College or in the Central Office department will be responsible for maintaining all documentation of any waiver request and disposition.

(f) Acknowledgment of University Policy. All employees described in section 3(b) above and all employees and CUNY Students granted a waiver under section 3(e) above must acknowledge, by signature, receiving a copy of the University’s Policy on Acceptable Use of Computer Resources (available at http://security.cuny.edu) and these IT Security Procedures.
Non-Public University Data Access Waiver
Information Security

For applicability, please refer to the CUNY Information Technology Procedures, Section 3 found at http://security.cuny.edu.

Waiver requested for (name): ____________________________________________________________

College, Department or Central Office: __________________________________________________

Role/Status: ____________________________________________________________
  (student, contractor, consultant, etc.)

Type(s) of Non-Public University Data to be accessed and justification:
  ____________________________________________________________
  ____________________________________________________________
  ____________________________________________________________

Duration of access required (one year maximum): _________________________________________

I agree to use the access provided solely for the authorized purpose above. I have read, understand and agree to comply with the University IT Security Procedures and the Acceptable Use of Computer Resources Policy as posted at http://security.cuny.edu under Security Policies & Procedures.

Signature Date

Supervisor / Oversight:

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Signature Date

Vice President for Administration, Vice Chancellor or designee:

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Signature Date

Accepting for approval as a scanned PDF attachment by email to security@cuny.edu

Accepted by University CIO, University Chief Information Security Officer or designee:

Signature Date

Rev: 2.3 2/6/2015