NSCS Information Security Program (ISP) Policies/Standards
Introduction to Final Drafts

October 7, 2019

Background

In 2018, the three State Colleges and the System Office – with assistance from a cyber-security consultant - completed a risk assessment of NSCS IT systems. The top recommendation of the risk assessment was to develop a set of comprehensive NSCS IT security policies that would drive standardization and reduce the level of effort required to create and maintain documentation. Not only would a set of IT policies direct the NSCS toward safer and more secure IT systems and practices, but it would also greatly assist with eventually meeting the requirements of the Gramm-Leach-Bliley Act (GLBA), a Federal law that applies to post-secondary institutions.

Initial work on the IT security policies began in the fall of 2018. A group of College and System Office IT leaders collaborated on organizing and drafting the NSCS Information Security Program (ISP) policies and standards, with the majority of the work occurring after the spring term ended in May of this year. The core group of IT leaders includes Ann Burk, Chadron State College Chief Information Officer; Dr. Gene Beardslee, Peru State College Chief Information Officer; John Dunning, Wayne State College Vice President for Information Technology; and Steve Hotovy, NSCS/System Office Vice Chancellor for Facilities and Information Technology. After several generations of revisions, the drafts were shared with key College IT staff and administration personnel for review and feedback during the month of June. In July, the ISP Group reconvened to incorporate review comments into a new version of the documents. On August 2nd, a series of documents including a proposed new Policy 7003, proposed revised Policies 5008 and 8064, and the proposed new ISP Standard 5: Acceptable Use Policy was shared with faculty and staff for review.

Based on the feedback received, it was prudent to further refine the documents and send them out for a **final round of employee review that will close on October 24, 2019**. Even though many of the sixteen ISP Standards are technical in nature, all have been made available for review. The results of this review will inform a final revision process, with the comprehensive set of documents slated for submission to the Board of Trustees for review and action at the November 14, 2019 Board Business Meeting.

Important Items to Remember When Reviewing

1) After Board approval, the ISP set of proposed Policies and Standards will be revised on a regular basis and as required by changing regulations, or as suggested by IT staff or employees. The ISP Group is required to review the Policies and Standards annually.

2) A number of proposed ISP requirements are aspirational, and will require procedures to be revised or developed by College IT staff for future compliance. Such procedures will be reviewed, adjusted, and implemented as resources permit, and within a reasonable time period as determined by College IT leaders.

3) During the current review period, please forward comments and suggestions to your College HR Director before the deadline. However, if you have questions during this time that you would like to discuss, feel free to contact your College representative on the ISP Group, or Steve Hotovy at the System Office.

A Word About Freedom and Privacy

For those concerned about freedom and privacy, please carefully read the definition for "Technology Resources," proposed Standard 5 (AUP), and proposed Standard 15 (BYOD). Also note that in proposed revised Policy 5008, the Policy only addresses NSCS owned Technology Resources, and thus, the "inspection" mentioned on page 1 does NOT apply to private devices. We hope all will agree that the final drafts of the proposed ISP Policies and Standards will alleviate concerns about the loss of freedom or privacy.

ISP Drafts Navigation Tips

Proposed new Policy 7003 creates the NSCS ISP, and lists the sixteen ISP Standards. This document should be reviewed first to understand the purpose of the ISP, the individuals responsible for maintaining it, and to whom it applies.

Proposed ISP Standard 1: Definitions and Related Law, Policy and References, should be reviewed next for an understanding of important terms that appear often in the Standards. Perhaps the most important definition in Standard 1 is for the term, "Technology Resources." Knowing what this term means, and what it includes or does not include, will greatly help with understanding the Standards as written.

Proposed revised Policy 5008: Employee Use of System Technology Resources, is the next document recommended to review. Although this is an existing Policy, many revisions are necessary to bring it up to date and to make it consistent with the proposed ISP Standards, including the proposed new NSCS Acceptable Use Policy located in Standard 5.

Proposed ISP Standard 5: Acceptable Use Policy (AUP), provides for the proper use of NSCS Technology Resources and is an agreement between the users of these Resources and the NSCS. The proposed AUP addresses Confidentiality, Privacy, Rights of both NSCS and users, Responsibilities, Restrictions, and Prohibited Uses.

Proposed ISP Standard 15: Bring Your Own Device (BYOD), provides more detail regarding the use of private devices for NSCS business, and addresses protection and support offered for these devices, as well as employee responsibilities for utilizing their own devices for NSCS functions.

Proposed revised Policy 8064: Capital Construction and Information Technology (IT); Bids, adjusts the current practice for IT procurement (on Policy page 5 of 6) to include a required consultation with the College CIO prior to initiating the procurement process. This makes the Policy consistent with proposed ISP Standard 10: Information Technology Acquisition.

After reviewing the above documents, the remainder of the proposed ISP Standards can be reviewed in any order that the individual desires.

Questions can be directed to:

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