



NYSPI System Registration Procedure

Summary

All multi-user applications and systems supporting NYSPI business are required to be registered with NYSPI IT. This requirement is regardless of whether the system will transmit, store or use PHI, ePHI, or PII information or whether the system is running from the NYSPI network or other network or service provider. This is to ensure that the location of all NYSPI data is documented and to help reduce duplication of systems and efforts where shared or standard services may be available.

NYSPI will use the functional components of the CUMC-definition for a “system” found at <https://secure.cumc.columbia.edu/cumcit/secure/security/faq.html>. At time of publication of this standard, a system is defined as:

a multi-user application or service ... which resides on one or more computing device(s) and transmits, stores, or processes ... data. Any business process and/or application running on a Server is a System. Individual Endpoints are not considered Systems, unless they are performing Server functions.

All NYSPI systems must further comply with all requirements described in the NYSPI Systems Management Procedure located on the psyIT intranet site, <http://psyit.nyspi.org>.

Scope

This procedure shall apply to all technology developed or operated for NYSPI or within the NYSPI network, regardless of the operators or custodians of the solution or funding source of the operators or systems.

Procedure Statement

1. System owners, who typically manage business processes in the Institute, may delegate system registration tasks but will ultimately be responsible for the process and implication of any findings.

2. System owners or other custodians may register systems using the NYSPI system registration survey at <http://www.surveygizmo.com/s3/3496128/System-Registration> or by contacting NYSPI IT at psytit@nyspi.columbia.edu
3. System registration will include all information needed for CUMC and NYS registration processes, including but not limited to:
 - 3.1. System demographic data such as:
 - System Name
 - Business Function
 - Key contacts including a named Business Owner and IT Custodian
 - Funding source(s) as relates to policy applicability
 - 3.2. Service availability requirements including recovery time objective (RTO), recovery point objective (RPO) and disaster recovery (DR) requirements
 - 3.3. System technical information including:
 - Hosting location
 - Application type
 - Server(s) and/or URL(s)
 - High-level security controls
 - 3.4. Data / Information classification, including data types and regulatory requirements
 - 3.5. System user information, including user populations and counts
4. psytIT will process all system registrations on behalf of NYSPI and will coordinate final submission of all registrations, including both CUMC and NYS registration submissions. psytIT may work with IT custodians and/or business contacts to complete a thorough registration.
5. Systems which meet CUMC or NYS risk thresholds may require additional risk assessment and/or certification requirements.
6. System registrations will be reviewed periodically and updated as systems information changes.

Exceptions

Requests for exceptions to these procedures should be directed to the contacts listed below and will be acknowledged within 2 business days or will be automatically approved.

Contact

Questions or requests for exceptions shall be directed to both the director of psytIT and the OMH Chief Information Security Officer. E-mails may be sent to the current individuals directly or to PsytIT-Admin@nyspi.columbia.edu .

Review Schedule and Version History

Date	Description of Change
4/24/17	Initial draft
5/1/17	Initial release

