Policy on Responsible Use of NYU Computers & Data

AC B

Responsible Officer: Associate Provost and Chief Information Technology Officer Date of Latest Revision: February 6, 2006

POLICY STATEMENT

New York University expects members of the University community and affiliates to employ reasonable and appropriate administrative, technical, and physical safeguards to protect the computer and data resources that they use and the sensitive data stored on these resources. Access to computer and data resources (including software, hardware, computer, and email services) are privileges extended to members of the University community and affiliates, and must be exercised in conformity with all applicable NYU policies and procedures and all applicable federal and state laws. Access to NYU computer and data resources is limited to authorized persons and is for approved purposes only. Approved purposes are those consistent with both the broad instructional and research goals of the University and the person's relationship with the University. Authorization to use these resources is granted by designated individuals at the University entrusted with overall responsibility and management of data and related systems. Acceptance of authorization to use NYU computer and data resources establishes an obligation on the part of the individual to use these resources responsibly as defined in the Policy Requirements and Specifications below.

This policy does not form a contract of any kind, including, among others, an employment contract. The University reserves the right to modify this policy without notice and at its discretion. The current version of this policy is posted on the ITS website (www.nyu.edu/its/policies/). All terms noted in *italics* are defined at the end of this policy.

REASON FOR POLICY

New York University is a not-for-profit research university, and its facilities, including computer and data resources, are to be used in furtherance of its not-for-profit, educational, research, and service purposes. More and more university activities are conducted using computers and electronic communications, with increased convenience and accessibility from and to all parts of the world. At the same time, today's interconnected environment intensifies the risks and threats of unauthorized access to computers, inadvertent disclosures of sensitive data, and unexpected destruction of essential information, resulting in potentially serious consequences to individuals and to institutions. Members of the University community and affiliates interact with a wide spectrum of sensitive data for numerous reasons. Evolving federal and state regulations

require organizations and individuals to protect sensitive data. With computing so widely distributed throughout NYU, the responsibility to safeguard computers and data resources extends to all members of the University community and affiliates.

WHO IS AFFECTED BY THIS POLICY

This policy applies to members of the University community and affiliates who use NYU's computer and data resources and /or who have access to sensitive data stored on these resources.

POLICY REQUIREMENTS

- A. Acceptance of *authorization* to use NYU *computer and data resources* establishes an obligation to:
 - 1. behave in accordance with NYU's educational, research, and service purposes and in a manner compliant with this and other applicable NYU policies and procedures and all applicable laws and regulations;
 - 2. behave with civil regard for other members of the NYU community and of the wider community on the Internet;
 - 3. take reasonable steps to ensure that any computer used to access NYU resources, whether it is located on an NYU campus or elsewhere, is secure, virus-free, and otherwise not compromised;
 - 4. protect the confidentiality, security, integrity, and recoverability of all computer and data resources and take reasonable and appropriate steps to guard these resources from improper or unauthorized use, including such use by third parties;
 - 5. use applications that conform to NYU's privacy and security policies and guidelines;
 - 6. refrain from activities that interfere with the ability of others to use *computer* and data resources; and
 - 7. be aware of and comply with other relevant school and University policies, procedures, and business rules; in all cases the more stringent standard should be followed.
- B. This obligation applies regardless of:
 - 1. where the computer used to access *computer and data resources* is located in an NYU office, classroom, public space, or lab, or at home or elsewhere outside the University;
 - 2. who owns the device used to access or store the sensitive data; or
 - 3. the form or manner in which *sensitive data* are stored or transmitted, including, but not limited to, local file, shared file, file on removable media such as CD-ROM disk and jump drive, central database, fax, printer, copier, network, phone, email, or voice mail.
- C. Access and use, or causing or allowing access and use, of computer and data

resources, including email services, by anyone other than as permitted by NYU is strictly prohibited by NYU and by state and federal laws and may subject the violator to criminal and civil penalties as well as NYU-initiated disciplinary proceedings.

D. Use of some NYU computer and data resources may be governed by additional University, college, school, or departmental policies and procedures. Anyone authorized to use these resources is responsible to become familiar with and abide by such policies and procedures.

E. In order to safeguard the security and efficiency of *computer and data resources*, NYU computer systems and NYU-NET are routinely monitored and recorded for integrity and operation of the system by authorized University staff. *Computer and data resources* provided by NYU are the property of NYU and not the personal property of the individual.

F. Designated individuals at the University entrusted with overall responsibility and management of *computer and data resources* and *sensitive data* and related systems have decision-making authority for authorizing access to and use of those resources and systems.

1. These individuals at the University include, but are not limited to, University-wide administrators, such as the Registrar, Deans, and other School administrators, and the Senior Vice Provost for Research on data-intensive research projects.

2. These individuals at the University have responsibility for the development, implementation, and maintenance of policies and procedures related to authorizing access to the shared stores of the various categories of sensitive data in use in electronic form at NYU and for handling that data appropriately wherever it resides. Such individuals may delegate responsibilities as they deem appropriate in specific functional areas.

3. These individuals at the University may have more stringent standards for the use, storage, and transmittal of the data they manage than those set forth in this policy; the more stringent standard should be followed. Individuals authorized to use the data are expected to be aware of relevant current policies and to abide by them.

4. Access to sensitive data will be granted only on an "as needed/minimum necessary" basis.

H. Violators of this policy may be subject to disciplinary action, up to and including the termination of employment or contract with the University, or, in the case of

students, suspension or expulsion from the University. Anyone who knows or has reason to believe that another person has violated this policy shall report the matter promptly to his or her supervisor, in the case of students to the Division of Student Affairs, Director of Judicial Affairs, or to cito.policies@nyu.edu, as appropriate. Any attempt to retaliate against a person for reporting a violation will itself be considered a violation of the policy and may result in disciplinary action up to and including the termination of employment or contract with the University. The appropriate office or entity, including the Office of the Associate Provost and Chief Information Technology Officer, the Office of Legal Counsel, and other University officials as required, will lead the investigation into all alleged violations or reports of violations of this policy and, where appropriate, will take steps to remedy the situation.

SPECIFICATIONS

A. NYU Computer Security

1. Safeguarding Computers for Individual Use

This section describes measures to safeguard computers typically used by individuals in NYU-related activities and for accessing other University resources, such as NYU-NET. As used in these operational specifications, "computers" include but are not limited to desktops or laptop computers, personal digital assistants (PDAs), multifunction cellular telephones, USB flash memory drives, or similar devices.

- a. Physical Security
 - i. Do not give physical access to computers to unauthorized persons.
 - ii. Take appropriate precautions to prevent theft and damage.
 - iii. Where possible, position monitors to prevent casual viewing by visitors or passersby.
- b. System Security
 - i. Install anti-virus software and keep virus definitions up to date.
 - ii. Install operating system and software patches and take other recommended steps to mitigate known vulnerabilities of the computer in a timely manner.
 - iii. Use only NYU-approved software; do not download unauthorized software.
 - iv. Use a locking screensaver or other mechanism to prevent unauthorized use of the computer.
 - v. Do not leave your computer unattended without locking it or logging off.
 - vi. Do not install or use Peer-to-Peer file sharing software, such as KaZaA or Gnutella; these programs typically enable unauthorized remote access without any password to the contents of the computer.

- vii. Do not install or run software that requires a license without that license. Respect license agreements and do not infringe on the copyright of others.
- viii. Respond promptly to notices from authorized University staff that vulnerabilities have been detected in your computer's system.
- ix. Take particular care to secure your NYU-access information (e.g., log-ins, passwords) on home computers from unauthorized use by others.

c. Passwords

- i. Where possible, secure all computer accounts with passwords, and use passwords to protect all file sharing.
- ii. Use strong passwords. Strong passwords consist of at least eight (8) characters. They should not be dictionary words or readily guessable. They should include at least three (3) of the following four (4) characteristics in any order: upper case letters, lower case letters, numbers, and symbols.
- iii. Change passwords periodically. Avoid reusing a password for at least several change iterations. If you have multiple accounts, avoid using the same password for those accounts.
- iv. Do not keep passwords in plain text in a computer file or in plain sight on paper. Passwords should neither be sent in an email nor provided verbally by telephone. If you must communicate account access information in order to ensure business continuity, you should communicate it in a secure manner. Supervisors and managers should make certain that offices have plans for access to files and data for business continuity.
- v. Keep a well-secured copy of your passwords available for emergency access. Encrypt any computer file containing passwords. Keep any written file of passwords in a physically secure location, preferably separate from the computer or application they secure.
- vi. Passwords for sensitive websites or email accounts should not be saved on the computer.
- vii. Where possible, do not configure programs to automatically store passwords.
- viii. Shut down web browsers, email programs, or other applications that might store passwords temporarily when they are not in use.

d. Remote Access

- i. Any remote computer used to access NYU resources must conform to these Specifications and may be subject to further resource-specific restrictions. ii.
- ii. If you do not maintain or control the remote computer, do not use it for access to, or transmission of, sensitive data. Access to non-sensitive data may be permissible. Check with responsible department or a supervisor for guidance.

- iii. Use remote access software and services with caution. Pay special attention to the configuration of remote access software, hardware, and services to ensure that they do not present a security risk to your computer or to NYU. Consult with ITS Technology Security Services (security@nyu.edu) for guidance on how to choose, set up, and operate remote access technologies. iv.
- iv. Obtain prior authorization from both your senior management and the ITS Technology Security Services (security@nyu.edu) before using a modem with a computer connected to the University network. Modems present a significant security risk, because they enable unmonitored and uncontrolled remote access to NYU's network and data. v.
- v. Ensure that your computer is not configured to allow unauthorized access to NYU's network by other devices. Special access arrangements, such as wireless access, RAS (Remote Access Server) services access, and sharing network connections, must be authorized by the ITS Executive Director of Communications and Computing Services (C&CS).

2. Safeguarding Computers Used by Multiple Individuals

The section covers additional measures for safeguarding computers used by multiple individuals. All the operational specifications set forth above apply, as well as the following additional measures to safeguard such computers.

- a. Secure all computer accounts with passwords.
- b. Give accounts to authorized persons only; provide individual log-ins. If you share a computer with others, take appropriate precautions to protect sensitive data that others may not be authorized to access and, where possible, create separate accounts for each person who is authorized to use the computer, setting appropriate permissions.
- c. Where possible, enforce use of strong passwords and periodic password changes.
- d. Make every effort to maintain computer logs and review them on a regular basis.
- e. Stay familiar with best practices for administering the particular computer and use them.

3. Business Continuity

Take reasonable steps to ensure that, in case of emergency, another authorized person is able to access the NYU computer you use in order to provide continuity of NYU functions performed on and through it. There are numerous methods available of ensuring shared responsibility for data and systems rather than sharing passwords. For assistance, contact ITS Technology Security Services (security@nyu.edu).

4. Purchasing

Discuss adherence to applicable NYU policies and procedures as part of the purchasing process. Computers and software acquired for use with NYU computer

and data resources should conform to these specifications.

5. Equipment Disposal or Redeployment

Before disposing of or re-deploying hardware, comply with University computer disposal guidelines, which can be found at www.nyu.edu/asset/. Click on Computer Disposal. See also www.nyu.edu/its/security/disposal/.

B. NYU Data Security

1. Protecting Sensitive Data on Computers

a. Follow NYU Computer Security Specifications set forth above.

b. Know what data are stored on your computer, the sensitivity of that data, and what policies apply.

c. Keep local data retention to a minimum. Rely on unit, school, or University storage where you can.

d. Where possible, password protect or encrypt sensitive data.

e. Back up local data on a regular basis and keep the backup secure. Protect backups with the same level of security as the original data. Test backup recovery periodically to verify that it works.

f. If you use a computer shared with others, take appropriate precautions to protect *sensitive data* that others may not be authorized to access. Where possible, create separate accounts for each person who uses the computer, setting appropriate permissions.

2. Storing or Transmitting Sensitive Data

- a. Do not redistribute sensitive data to others within or without the University, unless you are an authoritative source for and an authorized distributor of that data and the recipient is authorized to receive that data.
- b. Do not allow sensitive data to be stored on computers or servers outside NYU, unless such storage is authorized.
- c. Whenever possible, sensitive data should be transferred in encrypted form, e. g., using SSL (Secure Socket Layer) or SSH (Secure Shell).
- d. Remember that email typically is not a secure form of communication. Care should be taken to be certain that the recipient is authorized to receive that data and the address is accurate.
- e. Sensitive data, including electronic protected health information (EPHI), Social Security numbers, or credit card information, should not be sent unencrypted via email. If use of email is necessary, use encryption technology to protect the transmission of sensitive data in email. This may include the use of VPN (Virtual Private Network), SSL, or encryption of the message itself using software such as PGP (Pretty Good Privacy).
- f. Do not transmit sensitive data using instant messaging technology (e.g., AOL Instant Messenger, Yahoo Messenger) which use servers outside of NYU. These services may allow sensitive data to be accessed by or stored by unauthorized parties. It is recommended that you consult with ITS

- Technology Security Services (security@nyu.edu) for guidance.
- g. Take special care when sending *sensitive data* by fax to make sure that it is clearly marked as confidential. Every effort should be made to ensure that only the intended recipient has access to the faxed information.
- h. Keep fax machines, printers, and copiers used for *sensitive data* in secure areas. Faxes, printouts, and copies of *sensitive data* should be picked up promptly and handled appropriately.

3. Disposing of Sensitive Data

- a. Sensitive data should be destroyed in a manner that prevents re-creation.
- b. Reformat or physically destroy any removable storage media (such as floppy disks, zip disks, tapes, or compact disks (CD)) that contained sensitive data before disposing of them.
- c. Shred printouts of sensitive data.
- d. Ensure that *sensitive data* are removed from devices you use before you dispose of or re-deploy those devices

4. Responding to Requests for Information

- a. Do not share sensitive data with representatives of the press (radio, television, print, or electronic media), other individuals, or in public forums, such as mailing lists or web bulletin boards, without appropriate authorization.
- b. Refer subpoenas and similar requests or demands for the release of *sensitive* data to the Office of Legal Counsel.

RELATED DOCUMENTS AND RESOURCES

- 1. NYU Guidelines for compliance with the Family Educational Rights and Privacy Act (FERPA): www.nyu.edu/apr/ferpa.htm
- 2. NYU Information Technology Services Policies: www.nyu.edu/its/policies
- 3. NYU Student's Guide, Policies and Procedures: www.nyu.edu/students.guide/
- 4. NYU HIPAA Information Security Policies: www.nyu.edu/its/policies/
- 5. NYU Responsibilities of All NYU Computer and Network Users: www.nyu.edu/its/policies/respon.html
- 6. Guidelines on equipment disposal or redeployment: www.nyu.edu/asset/ and www.
- 7. Email address for computer security assistance and advice: security@nyu.edu
- 8. Email address for policy clarifications and suggestions: cito.policies@nyu.edu
- 9. Email address to report policy violations: cito.policies@nyu.edu

DEFINITIONS

1. Affiliates refers to individuals who have contractual or other relationships with the University and who are not employees, faculty, or students.

- 2. Authorization in this context means to grant permission to an identified individual to use a computer or data resource. Acceptance of authorization to use NYU computer and data resources establishes an obligation on the part of the individual to use those resources responsibly.
- 3. Computer and data resources include computers and computing devices; computing, application, and database access (including passwords); software, hardware, computer, and email services; and associated computing accounts.

 Computers and computing devices include, but are not limited to, desktops or laptop computers, personal digital assistants (PDAs), multifunction cellular telephones, USB flash memory drives, or similar devices.
- 4. Members of the University community refers to full- and part-time employees, faculty, and students.
- 5. Sensitive data include, but are not limited to, information about prospective, current, and former students, patients and clients of medical and dental facilities and services, and users of legal and other services, employees and donors; also information concerning research and University business, finance, and operations, and passwords. Federal and state laws and regulations, as well as University policies and office procedures, regulate the handling and reporting of many different kinds of sensitive data.

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World Wide Web Policies & Procedures

I. General Statement

The World Wide Web (the "Web") offers the New York University ("NYU") community rich resources for advancing teaching and research. Individuals can retrieve materials for use in their classes and scholarly activities as well as present materials for use by others. NYU supports the rights of students and faculty to create and receive educational information available through the Web, in keeping with its principles of academic and intellectual freedom.

Access to the Web is made available to the students, faculty and eligible staff of NYU as part of the educational computing and networking resources of NYU. Such resources and the ability to create a Web home page that is either linked to the official NYUHome pages or posted using NYU computer facilities are privileges extended to members of the NYU community, within the available resources of NYU, and must be exercised in conformity with all applicable NYU policies and procedures and all applicable federal and state laws.

If any person has any doubt as to the applicability of the policies and procedures referred to herein, such person should contact webteam@nyu.edu before taking any action. Persons who do not want their Web activities to be restricted by the policies and procedures contained in this document, are advised to contact commercial Internet service providers.

II. NYU Policies Concerning Use of Computer Facilities and Creation of Web Pages NYU is a nonprofit educational institution and the use of its facilities, including computer facilities, is limited to the educational and other nonprofit purposes of its students, faculty and eligible staff. Accordingly, Web pages may be created and posted only for the educational and research purposes of the NYU community. No person may include in a Web page any advertising materials or other materials relating to business or commercial activities of such person or any third person. The content of any Web page and its compliance with applicable policy and law is the sole responsibility of the author.

At any point in time, there are likely to be various federal and state laws that impose civil and/or criminal liability for computer network transmission of certain types of materials or messages. Currently, such laws restrict or prohibit transmission of, among other things, obscene materials to minors and child pornography, and messages or materials that constitute libel or harassment.

Creation of Web pages for educational and research purposes may involve incorporation of original works of third parties (e.g. literature, photographs, music, software, film, and video works) that are covered by copyright laws. Web page authors are encouraged to obtain all permissions that may be necessary to incorporate works of third parties in their Web page. Use of such works may be permitted by principles of fair use, consistent with the copyright laws.

No person may use the name "NYU" or "New York University," the name of any school of NYU or any logo or trademark of NYU without first obtaining written permission from NYU's Office of Web Communications. It is permissible, however, for a Web page author to identify himself or herself as a student, faculty or staff member of NYU, as appropriate.

III. Other Policies

In addition to the policies set forth in this document, each person using NYU's computer and network facilities shall also comply with the policies contained in the Responsibilities of All New York University Computer and Network Users, Faculty Guide to Libraries & ITS, and the University Policies and Procedures set forth in The Student's Guide to NYU.

NYU receives its Internet access from NYSERNet, and any network activity that leaves NYU's network destined for the Internet, including the posting of all Web pages, is bound by any

policies of NYSERNet. In the event of an inconsistency between NYU's policy and those of NYSERNet, the more restrictive policy shall be observed.

NYU does not routinely monitor or edit the content of Web pages. However, in the event that NYU becomes aware of a violation of NYU policy or law that involves a Web page, NYU reserves the right to remove the Web page, restrict access to such page or take other action as deemed appropriate by NYU. Any such violation may also lead to disciplinary action in accordance with NYU rules and procedures, and referral to local, state and federal law enforcement authorities.

THIS DOCUMENT DOES NOT DISCUSS ALL APPLICABLE LAWS NOR SHOULD IT BE INTERPRETED AS PROVIDING LEGAL ADVICE. EACH WEB PAGE AUTHOR IS RESPONSIBLE FOR COMPLYING WITH ALL APPLICABLE LAWS WITH RESPECT TO HIS OR HER WEB PAGE.

For more information about creating personal Web pages, read the NYU Web Guide. Any questions concerning this policy should be directed to webteam@nyu.edu.

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Page last reviewed: August 22, 2006 for URL updates

Addendum to the World Wide Web Policies & Procedures—March 16, 2007

Other NYU policies with which members of the NYU community should comply include:

Policy on Responsible Use of NYU Computer and Data

Policy on Personal Identification Numbers

Policy URL: http://www.nyu.edu/its/policies/webpolicy.html

Policies and Guidelines for Sending Bulk Email at NYU

Information Technology Services has a strong interest in promoting the proper utilization of email at NYU. When used at its best, email is a powerful tool for conducting business swiftly, without generating large amounts of paper. If misused, however, email can generate significant negative reactions that do not normally occur with bulk mail on paper. Even worse, NYU can become victimized by commercial activities or individuals with malicious intent; this can threaten the orderly running of the University's computing services.

Email Direct is an evolving ITS service for NYU faculty and administrators. It requires advance authorization, which can be obtained by sending email to email.direct@nyu.edu. With this background in mind, ITS offers authorized NYU employees the following guidelines and recommendations for directing email to groups at NYU.

Using NYU Email Direct

For sending bulk email, please use NYU Email Direct. Email Direct will ensure that email lists are kept confidential, systems are properly scheduled for orderly delivery, bounced email and other anomalies are handled in a structured environment, and that mailings are coordinated across the University. For each Email Direct mailing, you need to provide the following information:

- the name and address from whom the email will be sent
- the subject of the email
- the text of the email
- a selection from predefined groups of individuals who will get the email (e.g., all CAS freshmen) and, optionally, a list of addresses that you possess or generate from a database extract

Note that you supply all of this information via our Web frontend. Email Direct is a fully web-based application. To use NYU Email Direct, go to the <u>Email Direct submit page</u>.

Sending Email to a Group

For lists of any substantial size, you must conceal the names on the list. Displaying the recipients (failing to conceal the list) has several problems: it reveals the addresses of individuals who might not want their addresses broadcast; it makes it possible for the various recipients to reply to all the original recipients, which can have a snowball effect; it

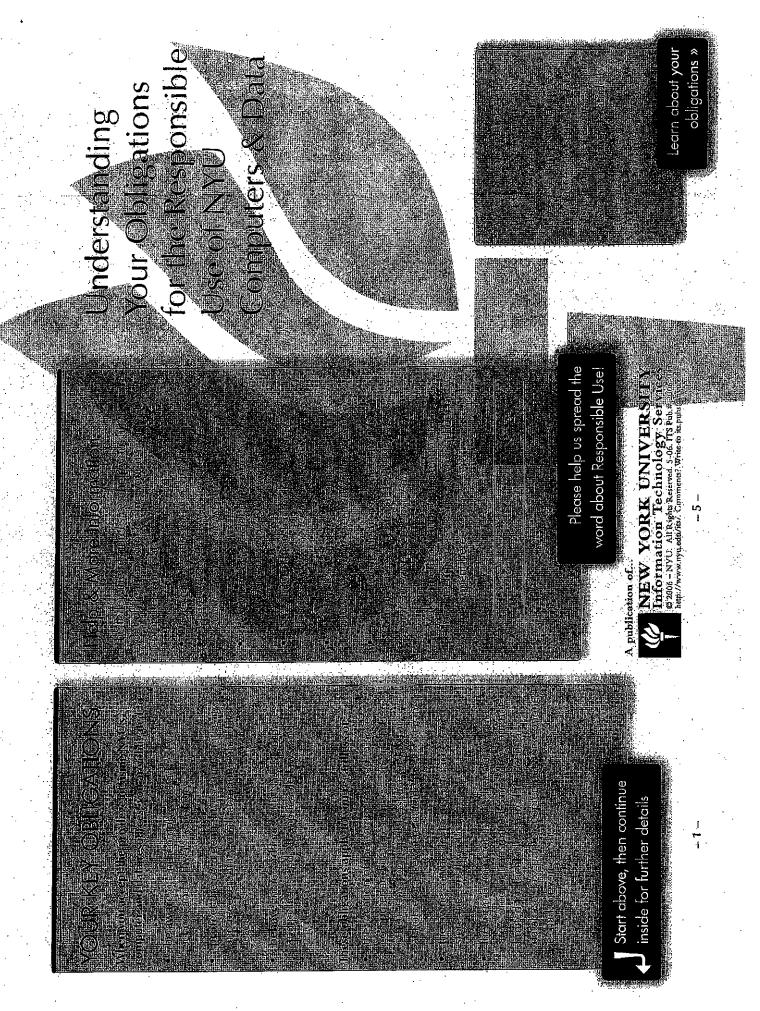
makes it possible to mistakenly reply to the entire list instead of just the sender; and it allows unscrupulous individuals to collect and redistribute NYU email addresses, particularly to commercial parties outside NYU targeting NYU students. Remember that once a list becomes public via your email, there is no way to get it back.

The easiest way to prevent those receiving the email from seeing the other recipients is to put the list of addresses in the "Blind cc" (Bcc) field in your email software. You may leave the "To" field blank. In addition to using the "Blind cc" field, you may want to set a "Replyto" field (sets an address for recipients to reply to) and have the capability of setting the "From" field. Eudora Pro and Pine are two good email programs that have these capabilities.

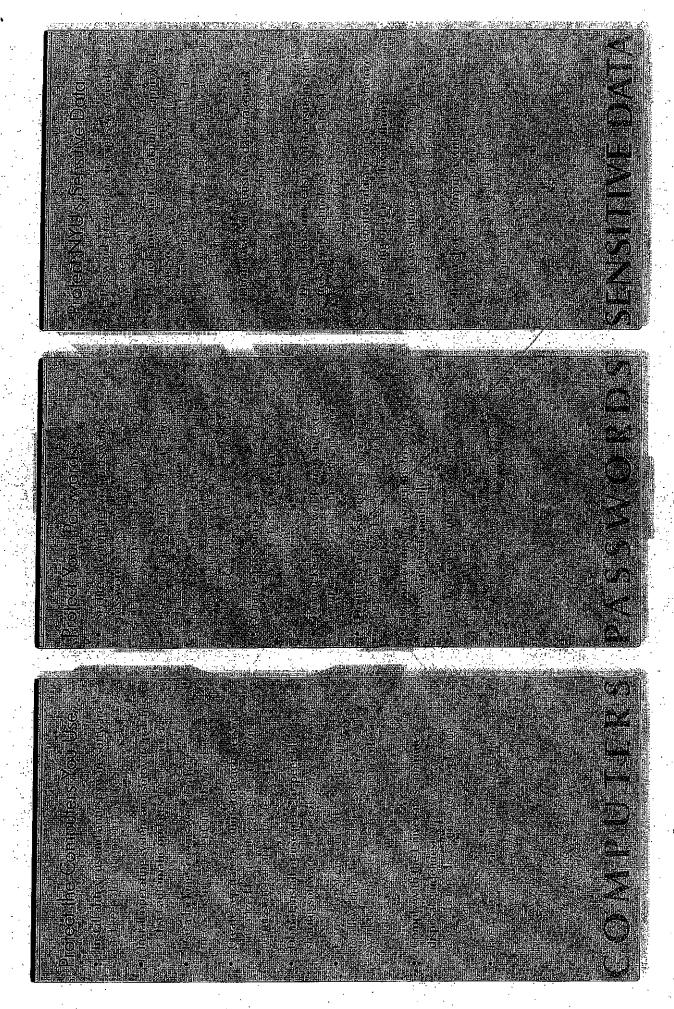
Help and Additional Information

For assistance with Email Direct, visit the <u>About Email Direct</u> page, or send email to <u>email.</u> <u>direct@nyu.edu</u> BEFORE you send the mail. After the mail is sent, it will be difficult or impossible to correct errors!

Page last reviewed: August 28, 2006



14



ITS Policies & Guidance

ITS General Policies
NYU-NET Guidance
HIPAA Policies

Related University Policies

ITS General Policies

A Note on Illegal Downloading (March 2007)

Data Classification at NYU (June 2008)

Policy on Responsible Use of NYU Computers & Data (February 2006)

Understanding Your Obligations for the Responsible Use of NYU Computers & Data (340K

PDF) (Adobe Reader required)

NYU Student Email Policy (September 2003)

Guidelines for Student Email Use (September 2003)

Responsibilities of All NYU Computer and Network Users (July 2006)

ITS Scheduled Maintenance Guldelines (April 2003)

NYUHome: Specific Policies and Information (June 2002)

ResNet Accounts: Specific Policies and Information (September 2004)

Responsibilities of Students Using the NYU Phone System (August 2006)

Responsibilities of Faculty, Administrators, and Staff Using the NYU Phone System

(August 2004)

World Wide Web Policies and Procedures for All NYU Computer and Network Users

(August 2006)

Suspended Accounts (June 1998)

Policies and Guidelines for Sending Bulk Email at NYU (October 2004)

Personal NYU Email Address Policy (October 2004)

NYU-NET Guidance

Security Scans on NYU-NET (August 2004)

Operational Principles (November 2002)

Providing Network Access to Outside Organizations (September 1993)

Configuration of Modern Pools on NYU-NET (May 1994)

Authenticated Access to the Internet (February 1995)

Restrictions on the Use of Napster (June 1998)

Frequently Asked Questions about Napster (August 2006)

Mail Anti-Relaying Policy (December 1998)

Network Distribution of Copyrighted Materials (December 1998)

Operating DNS Servers on NYU-NET (October 1999)

Internet Domain Names Outside NYU, EDU (August 2006)

Windows 2000 Active Directory Disrupts NYU-NET (May 2000)

HIPAA Policies

The Health Insurance Portability and Accountability Act (HIPAA), signed into law on August 21, 1996, includes complex regulations especially regarding the privacy and security of health information. NYU's Board of Trustees designated the University as a "hybrid entity" under HIPAA with three health care delivery units (covered components): the School of Medicine, College of Dentistry, and University Health Center. NYU's 12 non-health care delivery units consist of other designated University administrative units to the extent that each performs activities that may involve access to Individually identifiable health Information in supporting the three covered components. In order to comply with the standards and implementation specifications that comprise the administrative, physical, and technical safeguards and the organizational, procedural, and documentation requirements of the HIPAA Security Regulations, NYU has developed a set of 19 policies and accompanying definitions.