



<b>New York State Information Technology Policy</b>	<b>No:</b> NYS-P10-005
<b>IT Policy Name:</b>  <b>Enterprise Identity Management (EIM) Governance Authority</b>	<b>Updated:</b> 10/5/2010
	<b>Issued By:</b> NYS ITS State Chief Information Officer Director Office of IT Services  <b>Policy Owner:</b> Computer Networking Services

## 1.0 Purpose and Benefits of the Policy

---

This policy defines a Governance Authority (GA) for a New York State Enterprise Identity Management Infrastructure (EIM). An EIM is envisioned as a state-wide infrastructure of policies, procedures, and technology that will provide and manage digital identities for users of State government online services. The EIM will allow the identification and registration of users, and issue and manage electronic credentials that will be trusted and used by participating State entities.

**Governance** in this context is defined as the leadership, organizational structures, and processes that ensure that the EIM infrastructure operates consistently and effectively in a manner that meets New York State's EIM objectives while serving the needs of its participants and customers.

This EIM Infrastructure will:

- Protect privacy by limiting the provision of personal information needed to access State agency e-government online services
- Reduce the likelihood of identity-based fraud
- Relieve agencies of the need to implement and manage their own digital identity infrastructure for e-government services
- Provide identity credentials that meet the security and business needs of a State agency's online services

- Reduce the cost of providing online services that require user authentication
- Enable system interoperability and improved data quality by setting the data, technology and process standards required to attain increasing levels of identity trust
- Maximize the potential for New York State identity credentials to be trusted by non-state entities by ensuring alignment with national and international identity trust standards

The establishment of an effective GA is essential to realize these benefits.

## 2.0 Enterprise IT Policy Statement

---

Section 2 of Executive Order No. 117 provides the State Chief Information Officer, who also serves as director of the NYS Office for Technology, the authority to oversee, direct and coordinate the establishment of information technology policies, protocols and standards for State government, including hardware, software, security and business re-engineering. Details regarding this authority can be found in NYS ITS Policy NYS-P08-002, Authority to Establish State Enterprise Information (IT) Policy, Standards and Guidelines.

## 3.0 Scope of the Policy

---

This policy applies to all “State government entities,” as defined in NYS Executive Order 117, that choose to participate in or use any of the services provided by a NYS EIM Infrastructure.

## 4.0 Policy Statement

---

The New York State Office of Information Technology Services (ITS) will serve as the NYS EIM GA with the authority, functions, structure, and operating principles defined in this policy. ITS will exercise its functions as the EIM GA in consultation with the New York State CIO Council and other interested State entity officials including owners of online State services.

### 4.1 Authority

The GA will have management authority over the general operation of any EIM Infrastructure established for New York State government including determining the rules of participation within the infrastructure and how shared identity management services will operate. It will also have the authority to delegate direct administrative functions to existing state entities, where appropriate. The GA will have enforcement authority to remove or suspend a State entity from participating or performing a specific role (e.g., RA, CSP) in the EIM that does not comply with its policies, standards, or business rules. The GA will operate within the confines of the principles set forth in section 4.4 herein.

### 4.2 Functions

The GA will have the following specific functions.

**4.2.1 Coordinate staff and other resources for the purpose of building, maintaining, and operating the EIM Infrastructure:** It will be responsible for coordinating the use of these resources within the confines of applicable laws, regulations, and administrative processes.

**4.2.2 Propose the development or modification of enterprise-wide policies and standards related to EIM:** Draft policies and standards or modifications of such policies and standards will be developed by or under the auspices of the GA and promulgated as mandatory policies and standards through the existing ITS policy and standards process detailed in NYS-P09-003 Development of Enterprise IT Policies and NYS-P09-002 Process for Establishing Enterprise Information Technology Standards.

**4.2.3 Interpret the NYS Trust Model Policy and other EIM related enterprise policies and standards:** The GA will be the final authority in interpreting the NYS Trust Model and related policies and standards as well as monitoring their implementation and compliance.

**4.2.4 Develop business and operating rules for an EIM Infrastructure:** The GA will develop and promulgate the operating rules and procedures for the EIM Infrastructure. It will have the authority to modify these rules and procedures and establish processes for modifying rules and procedures as well as granting exceptions. It will also facilitate the development of any necessary agreements between participating State entities.

**4.2.5 Set and enforce requirements for EIM participation and for performing EIM Infrastructure roles and responsibilities:** This includes the following EIM roles defined in the Identity Trust Model Policy:

*Credential Service Provider (CSP)* operates services that support the issuance of identity related credentials and tokens, and the subsequent management of those credentials.

*Registration Authority (RA)* provides identity proofing and verification of identity of the user to a CSP, which issues the credentials.

*Service Provider (SP)* relies on users' credentials issued by a CSP to provide access to an online service or application.

**4.2.6 Monitor and conduct compliance reviews:** The GA will establish a process for ongoing monitoring of EIM services and arrange for periodic compliance reviews to detect any deficiencies requiring remediation.

**4.2.7 Coordinate education, training, and marketing:** The GA will coordinate education, training, and marketing efforts directed at promoting participation in the EIM by State entities.

**4.2.8 Liaison with state entities and other stakeholders:** The GA will be the point of contact for the EIM for State entities, other stakeholders, and interested parties. It will reach out to and coordinate with identity management efforts utilized in the federal government, other states, and the private sector.

### **4.3 Governance Structure**

The organizational structure of the EIM GA will be established through incremental steps beginning with an Enterprise Governance Advisory Group. This interim arrangement and process to establish an ongoing GA are outlined below.

#### **4.3.1 Enterprise Governance Advisory Group (EGAG)**

The EGAG will consist of the ITS EIM Project Governance Team augmented by representatives from other State entities with early EIM projects. This team presently consists of representatives from a number of agencies participating in the EIM Project. The EGAG will have the authority to add additional representatives including those representing other stakeholder groups such as information and service owners.

The EGAG will have all the authority and functions of a GA detailed in section 4.2 and to the extent possible adhere to the operating principles in section 4.4. However, any procedures or processes established by the EGAG will be considered interim until they are reviewed and accepted by the ongoing governance structure. The EGAG will have the added function of building the ongoing governance structure as outlined below.

#### **4.3.2 Establishment of Ongoing GA**

The EGAG will develop and submit an organizational structure for an ongoing GA based on this policy to the New York State CIO/Director of the Office for Technology for approval, which is expected to take six months after the promulgation of this policy. The ITS will ask the NYS CIO Council and other stakeholder groups to review and comment on the proposed organizational structure. The EGAG will manage EIM governance until an organizational structure for an ongoing GA is approved and implemented.

### **4.4 Operating Principles**

The GA will adhere to the following principles.

**4.4.1 Mandated Authority:** The GA will be authorized by the ITS under existing statutory and regulatory mandates (NYS ) to manage and make decisions on all key issues relating to EIM. This includes the development of principles and standards for application across the New York State government and the identification and advocacy of such policies that may be required to advance the identity management and support strategic initiatives.

**4.4.2 Inclusive:** In fulfilling its obligations, the GA shall respect existing entities performing identity related activities and integrate such activities into an enterprise solution. The GA shall include representatives from various government organizations who have a business interest in an enterprise approach to managing identities including the owners or stewards of government services and information. Given that similar identity information management challenges and issues are faced by local government entities, the governance structure and process may include representatives from those entities.

**4.4.3 Works within existing legislative framework and governance processes:** Policies and processes for identity management in NYS government will work within the current legislative framework, including privacy and related legal requirements. Similarly, NYS EIM governance processes and structures will be aligned where feasible with existing relevant governance processes within government to avoid duplication of effort.

**4.4.4 Standards, policies and procedures-based:** Enterprise identity management standards, policies and procedures must be created in collaboration with business owners, information owners, and other stakeholders – not driven top down from a central agency. At the same time, such an approach must be based on the acceptance of minimum, government-wide policies and standards. The governance process must contain an exception, issues management and escalation process that can address variance from adopted NYS identity management standards and policies.

**4.4.5 Collaborative, Flexible and Evolving:** An enterprise-wide approach to identity management will need to evolve over time, allowing State entities to continue to operate identity information management solutions that meet their specific business needs while respecting the need to develop and transition to a minimum, enterprise-wide standard needed to underpin an enterprise approach.

**4.4.6 Accountable:** The GA must operate in a clear, transparent way to promote citizen trust in government's management of identity information. The public use of identity information must be clearly articulated and public knowledge regarding managing identity information promoted.

## 5.0 Policy Compliance

---

This policy shall take effect upon publication. The ITS shall review the policy at least once every two years to ensure relevancy. The ITS shall also assess agency compliance with this policy. To accomplish this assessment, ITS may issue, from time to time, requests for information concerning compliance with this policy to State government entities, which information may be used to develop analyses and reports as may be requested by the Executive Chamber or Legislative entities.

## 6.0 Definitions of Key Terms

---

A complete listing of defined terms for NYS Information Technology Policies, Standards, and Best Practice Guidelines is available in the "NYS Information Technology Policies, Standards, and Best

Practice Guidelines Glossary (<http://www.its.ny.gov/policy/glossary.htm>).”

## 7.0 Contact Information

---

Submit all inquiries and requests for future enhancements regarding this policy to:

**Policy Owner**  
**Attention: Computer Networking Services**  
**New York State Office of Information Technology Services**  
**State Capitol, ESP, P.O. Box 2062**  
**Albany, NY 12220**  
**Telephone: 518-473-0234**  
**Facsimile: 518-473-0327**

Questions may also be directed to your ITS Customer Relations Manager at:  
[Customer.Relations@cio.ny.gov](mailto:Customer.Relations@cio.ny.gov)

The State of New York Enterprise IT Policies may be found at the following website:  
<http://www.its.ny.gov/tables/technologypolicyindex.htm>

## 8.0 Revision Schedule and Review History

---

<b>Date</b>	<b>Description of Change</b>
10/05/2010	Original Policy Release
09/12/2012	Reformatted and updated to reflect current CIO, agency name, logo and style.
10/05/2012	Scheduled Policy Review

## 9.0 Related Documents

---

NYS State Identity Trust Model Policy