

Software, SaaS and Technology Asset Acquisition Guidelines

PURPOSE

To ensure that technology purchases comply with CUNY and City Tech requirements for information security, data protection, accessibility, licensing, procurement, and technology compatibility, all software, SaaS/cloud services, subscriptions, and applicable technology acquisitions must follow the review process outlined below.

The objective is also to make the procurement process more efficient by ensuring that questions about a product are answered by the individuals who understand the product and its intended use, rather than by the individual who happens to enter the requisition.

REQUESTIONS AND END USER RESPONSIBILITY

The individual or department that will **use, administer, or serve as the business owner of the technology** is responsible for providing the information necessary for its review and attests to the accuracy and nature of use. If the use changes, it is the responsibility of the business owner to notify ITS and submit the necessary information for review.

For software, SaaS/cloud platforms, subscriptions, rentals, and leases, two forms are required to be submitted along with the procurement requisition:

1. **Software-Library-Subscription-Rental-and-Lease Questionnaire**
2. **Information Security Review Questionnaire (ISRQ)**

CUNY may update the forms without notice therefore download the forms when you are ready or nearly ready to submit the requisition in CUNYBuy.

The person completing the forms should understand:

- what is being purchased;
- the business or academic purpose;
- who will use it;
- what data, if any, will be collected, entered, stored, processed, transmitted, or accessed;
- whether the product integrates with other City Tech or CUNY systems; and
- how the system will be used.

GUIDELINES

1. Engage the Vendor Before the Requisition Is Submitted

The requester should provide the applicable questionnaires to the **vendor at the time a quote is requested**.

The vendor should assist with questions requiring vendor-specific technical information. The requester/end user remains responsible for reviewing the completed information and confirming that it accurately reflects the College's intended use of the product.

This is particularly important for questions involving security, hosting, data handling, privacy, integrations, authentication, and other technical characteristics that a departmental requisition submitter may not be qualified to answer. You may reach out to ITS for assistance in communicating with the vendor regarding technology-related questions, but the requestor/end user remains the responsible party.

2. Complete the Documentation Before Submitting the Requisition

Once the requester has reviewed and confirmed the information, the completed forms and required supporting documentation should be provided to the individual responsible for entering the requisition in CUNYBuy.

The person submitting the CUNYBuy requisition does not need to be the person who will use the software or technology.

CUNYBuy guidance specifically recognizes that a Creator may create and submit requisitions on behalf of themselves or others and requires the Creator to provide the required supporting documentation.

The recommended workflow is:

Requester/End User → Vendor Assistance → Requester Validates Information → CUNYBuy Creator Submits Requisition → ITS Review → CUNY Review, if required → Procurement Processing

3. Requisition Requirements

The requisition should clearly identify what is being requested and include all required supporting documentation.

CUNYBuy guidance requires appropriate requisition details, business justification, category coding, and supporting documentation. It also provides for software-related and other applicable approval steps.

Using an incorrect category or failing to include required software documentation can result in the requisition being returned or delayed. This has occurred in the College's existing process when software was initially entered under an incorrect category and the required security questionnaires were consequently not submitted.

New forms and the same workflow and guidelines are required for renewals.

4. City Tech ITS Review

After the requisition and supporting documentation are submitted, ITS will review the technology request and the information provided.

ITS may have additional questions for the requester or may require additional information from the vendor before its review can be completed.

Completion of the two questionnaires does not automatically mean that every software purchase requires a separate CUNY Information Security Review.

The questionnaires are required for software requests, but the information contained in them helps determine whether additional review is necessary.

5. Data and Information Security Review

Any technology that involves artificial intelligence, will collect, access, receive, store, process, transmit, or otherwise interact with University data requires particular scrutiny.

The requester must accurately identify the type of data involved and the intended use of that data.

When the Software-Library-Subscription-Rental-and-Lease Questionnaire identifies nonpublic university data or confidential information, integration with CUNY systems or the Information Security Review Questionnaire identifies **Personally Identifiable Information**, the requisition is automatically flagged for attestation and forwarded to CUNY for ISRQ review. For this review to occur, sometimes CUNY will provide a link to be forwarded to the vendor. However, City Tech ITS may determine some requests that use non-public University data and/or sensitive information require CUNY ISRQ review.

Once referred, CUNY may request additional information as part of its review.

Questions already raised during CUNY technology reviews include what data will be entered into a system, whether submitted information may be used for AI model training, whether CUNY service-provider requirements such as MFA and SSO can be enforced, and how data usage will be controlled as access expands to additional users.

6. University Data and Cloud Services

Requesters should not assume that a product presents minimal risk simply because it is inexpensive, has a limited number of licenses, is described as "cloud-based," or is readily available through a vendor website.

The nature of the data and how the technology interacts with the University's environment are important components of the review.

City Tech's existing IT guidance identifies several applicable CUNY standards and procedures, including the **CUNY Data Classification Standard**, **CUNY Acceptable Use of University Data in the Cloud Standard**, **IT Security Procedures – General and Data Loss Prevention**, and **CUNY Breach Response and Reporting Procedure**.

Therefore, departments should **not purchase, activate, integrate, or begin using a technology service with University data until the applicable procurement and technology/security reviews have been completed.**

7. Other Technology Review Considerations

Depending upon the technology and its intended use, ITS may also need to consider matters such as:

- authentication, SSO, and MFA;
- integration with existing CUNY or City Tech systems;
- accessibility;
- licensing and subscription terms;
- cloud hosting and data location;
- privacy and protection of student or institutional information;
- data retention and deletion;
- vendor security controls;
- AI functionality and the vendor's handling of information submitted to AI services;
- technical compatibility and support requirements; and
- duplication of existing University or College technology services.

- Contractual and licensing concerns – License and usage contracts should be vetted with the College Legl Counsel

These considerations will vary by product and use case.