

Update on proposed Policy affecting personal devices at work

SAC Meeting

21 March, 2024

Vaia Papadimitriou



Policies recently reviewed by the POB

- New Policy on “Bring your own Device” and updated Policy on “Computer Security Life Cycle” **SEMD/Cybersecurity Team** – **March 13, 2024**
- Policy on “Appointments for retired Guests and Scientists Emeriti” **CRO Office** – **March 7, 2024**
- New Policy on User/Affiliate (Non-Employee) Extended Assignment Per Diem Reimbursement from **Finance** – **February 29, 2024**
- Policy on Fermilab Email Accounts with **FSO directive** – **February 21, 2024**
- Policy on Vulnerability Prioritization – **Cybersecurity Team** – **February 2, 2024**
- Policy on Vacation Time & Policy on Any Reason Leave – **HR** – **January 26, 2024**



Policy on Fermilab e-mail accounts

Submitted to POB on 2/21/2024 – Owner Jon Bakken

- Technically, this policy is not new, but it was never migrated (or on the policy site). The changes in this policy are coming from a directive from the Site Office to stop the practice of forwarding lab email to personal email by March 1st. ITD would like to begin communicating this change on February 26th.

Implemented



Policy on Fermilab e-mail accounts

Email Account

~~Fermilab will provide an email service for a~~ All FRA ~~e~~ Employees will be provided an email service. Certain ~~s~~ Subcontractors, ~~u~~ Users, ~~and a~~ Affiliates, and retirees may be provided with the email service by request. ~~by request~~. The service will be hosted on systems of Fermilab's choice. The rules and regulations in this document apply to mail stored in this email service. Each email account will have an address of the form ([name@fnal.gov](#)) where "name" is the username of the account holder's lab computer accounts. As a condition of use of this account, the account holder understands that Fermilab retains the right to examine the current contents of the account and monitor incoming and outgoing mail to and from these accounts. Under ordinary circumstances, however, the account holder's privacy will be respected.

Each ~~employee~~ will be provided with an email account. ~~FRA~~ Fermilab employees must use [name@fnal.gov](#) as their work-related email address. Employees must send and receive work-related email (including all email using the [name@fnal.gov](#) address) through the designated email servers.

Account holders are prohibited from auto-forwarding ~~Forwarding of~~ email from the account holder's ~~Fermilab~~ [NAL.GOV](#) mailbox to an external account ~~is~~ restricted.



Policy on Fermilab e-mail accounts

Policy Impact Analysis				
Purpose				
This form helps determine a communication plan for new and changing lab-wide policies and procedures.				
Instructions				
For each attribute below, select an impact corresponding to each attribute. The values, totals, and Policy Impact Score will be automatically calculated.				
Description of what is being analyzed			Guidance for what to consider for each attribute	
Impact		Value	Impact	
	# of people policy affects	5	1000+	Includes Employees, Users, Affiliates, Subcontractors, etc.
	Affects employee benefits / compensation	1	No impact	Implementing policy/procedure affects an employee's benefits, including compensation.
	Affects safety	1	No impact	Implementing policy/procedure affects the physical and/or psychological safety.
	Affects business	1	No impact	Includes Business Systems, Property, Legal, Reputation, Employee Morale, and Other Impacts
	Affects Finances / Budget	1	No impact	What is the total cost to implementing / updating this policy? Are new positions required? Changes to property / equipment? Additional costs to FRA for benefits? Etc.
Impact Total (Sum Total / 5)		1.8	Low	Low
Effort (to implement policy or changes to policy)	Documents	2	Minimal (<5 hr)	<input type="checkbox"/> None required to update or create documentation related to this policy
	Training*	1	None required	Who is required to take training related to the implementation of this policy?
	Resources, roles	1	No impact	Are changes to positions / role responsibilities or new positions required to implement this policy?
	Property/equipment	1	No impact	Changes / new property or equipment required to implement this policy / policy changes.
	Effort Total (Sum Total / 4)		1.3	Very Low
Policy Impact Score		GREEN		



Policy on Bring Your Own Device

Submitted to POB on 3/13/2024 – Owner Matt Kwiatkowski/Chief Information Security Officer

- The Cybersecurity Team has developed this policy to establish the minimum requirements and standard approach for when and how employees, affiliates and users can use their personally owned laptops and smartphones to access Fermilab Office 365 systems and data.

Name and office of individuals outside your Division / Project / Office who have reviewed this draft policy.

Jon Bakken, Beth Fancsali, Velma Gordon, Jennifer Gondorchin, Jennifer Goldberg, Ivy Gibson



Policy on Bring Your Own Device

1. Purpose

This policy establishes the minimum requirements and standard approach for when and how ~~Fermi Research Alliance, LLC (FRA) employees, and Fermilab users and affiliates, and users~~ can use their personally owned laptops and smartphones to access Fermilab ~~email and~~ Office 365 systems and data.

This Policy is not a contract and is not intended to create any obligations on ~~Fermi Research Alliance, LLC (FRA)~~. This Policy may be terminated or changed by FRA at any time, with or without notice.

2. Scope

This policy applies to ~~non-government funded (non-GFE)~~ computers and mobile devices, ~~and any other network attached devices~~ (wired or wireless) connected to Fermilab email or Office 365 environment.

3. Applicability

This policy applies to ~~Fermi Research Alliance, LLC (FRA)~~ and all its employees, ~~as well as~~ Fermilab users and affiliates.

4. Effective Date and Date Reviewed/Updated

This Policy went into effect on ~~[Date]~~.



Policy on Bring Your Own Device

5. Policy

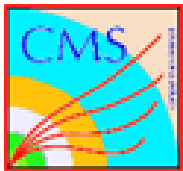
~~Fermi Research Alliance, LLC (FRA) employees, as well as and~~ Fermilab users and affiliates who choose to participate in [Bring Your Own Device \(BYOD\)](#) must abide by this policy while using a personally owned device to connect to Fermilab email or Office 365 environment.

Additional key policies when using personally owned devices include but are not limited to:

- [Policy on Computing](#)
- [CUI Policy](#)
- Authentication Policy
- [Policy on Export Control](#)
- [Policy on Photography and Videography of Technical Systems](#)

Employees who participate in the BYOD policy must:

- Agree to have Fermilab install the laboratory's mobile device management (MDM) software on their personal devices if they access Fermilab email or the Office 365 environment.
- Understand that the MDM software ~~that~~ Fermilab will use on your device will check compliance with Fermilab computing policies. For additional details on the compliance checks, please visit the [Fermilab Mobile Device Management \(MDM\) Program](#) web page.



Policy on Bring Your Own Device

https://cybersecurity-atwork.fnal.gov/fermilab-mobile-device-management-mdm-program/

This will need to be populated with info soon

Cybersecurity at work

Fermilab Mobile Device Management (MDM) Program

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Fermilab Mobile Device Management (MDM) Program

Fermi Research Alliance, LLC (FRA) employees, Fermilab users and affiliates who choose to use their personal computing devices to connect to Fermilab email or the O365 environment must agree to have Fermilab install the laboratory's mobile device management (MDM) software on the device.

This page provides additional information about what to expect regarding compliance checks performed by the MDM software on your device.

Information is still forthcoming regarding Fermilab MDM software. Please check back in the next few weeks for more details.



Policy on Bring Your Own Device

Policy Impact Analysis					
Purpose					
This form helps determine a communication plan for new and changing lab-wide policies and procedures.					
Instructions					
For each attribute below, select an impact corresponding to each attribute. The values, totals, and Policy Impact Score will be automatically calculated.					
Description of what is being analyzed			Value	Impact	Guidance for what to consider for each attribute
Impact	# of people policy affects		5	1000+	Includes Employees, Users, Affiliates, Subcontractors, etc.
	Affects employee benefits / compensation		1	No impact	Implementing policy/procedure affects an employee's benefits, including compensation.
	Affects safety		1	No impact	Implementing policy/procedure affects the physical and/or psychological safety.
	Affects business		4	High	Includes Business Systems, Property, Legal, Reputation, Employee Morale, and Other Impacts
	Affects Finances / Budget		2	Minimal cost (< \$20K)	What is the total cost to implementing / updating this policy? Are new positions required? Changes to property / equipment? Additional costs to FRA for benefits? Etc.
	Impact Total (Sum Total / 5)			2.6	Medium
Effort (to implement policy or changes to policy)	Documents		2	Minimal (<5 hr)	Time required to update or create documentation related to this policy
	Training*		1	None required	Who is required to take training related to the implementation of this policy?
	Resources, roles		1	No impact	Are changes to positions / role responsibilities or new positions required to implement this policy?
	Property/equipment		2	Minimal changes	Changes / new property or equipment required to implement this policy / policy changes.
	Effort Total (Sum Total / 4)			1.5	Low
Policy Impact Score			ORANGE		



Policy on Bring Your Own Device

- Many comments and questions from members of the Policy Oversight Board.

Do we have a sense of how this will impact productivity of employees, users, and affiliates who choose to remove Fermilab email/O365 from their personal devices? And if there is a mission need to provide someone with a Fermi owned device, is there a plan? Has this been socialized with these groups?

March 13, 2024 at 1:56 PM

Additional clarity is needed regarding whether this will apply to accessing email via the web browser using email.fnal.gov.



Policy on Bring Your Own Device

b) I just looked more closely at the "Impact analysis" file. I see there:

Affects business	4	High	Includes Business Systems, Property, Legal, Reputation, Employee Morale, and Other Impacts
Affects Finances / Budget	2	Minimal cost (< \$20K)	What is the total cost to implementing / updating this policy? Are new positions required? Changes to property / equipment? Additional costs to FRA for benefits? Etc.

Do you know if these two rows are connected in anyway? **No, they are not.**

I suspect "no".

What I am asking is: does the "high" in "affects business" gets quantified in dollars as well? **No, it does not. The impact analysis drives the communication plan. I was planning on speaking to the POC about this because either way, the impact of this change will impact many people and they're going to have to do a good job communicating.**

It certainly affects the productivity of personnel who instead of handling from "everywhere", they now have to handle business only when they are in front of a Fermilab computer.

This can have a monetary implication as well. **I agree, but I'm not sure if there's much that can be done. We will find out in the meeting on Thursday. At a minimum, they need to have their site up and running so people can decide if they'd like to install the app or not.**

Do we have an attempt by the policy owners to quantify this inefficiency?

c) I assume that several people will find ways to conduct business without using the Fermilab e-mail system.

If so, the policy will not be as effective as assumed.

Is this a concern for the Lab? **I am not sure.**

If so, it might be useful to be more detailed in the "impact cell".



Policy on Bring Your Own Device

- As per the User Support Manager
 - Fermilab and Argonne are the first to implement these directives from DOE (it will roll out to the other labs in the future). The cybersecurity team is working closely with ANL to understand their implementation policy/procedure as well but most likely there is not another lab to benchmark against at the moment.
 - My office has also suggested a survey of users/affiliates to understand their usage of the current systems and any impact that this policy will have on their access to the Fermilab systems and productivity. From the comments of the POB, it sounds like either employees should be included in that survey, or a separate one should be conducted for employees. It is my understanding from the cybersecurity team that the survey will be conducted following the implementation of the policy and will drive the development of their procedures for BYOD.

I am puzzled by point 2.

V.P.

The cost and other impacts of the policy cannot be quantified in a reasonable way in my opinion unless a well thought survey is conducted that asks the appropriate questions to employees, users, etc. in either combined or separate surveys.

It may be damaging to implement something and then go to collect the broken pieces.



Policy on Bring Your Own Device

- Scientific Impact needs to be quantified
 - Productivity reduction
 - Employees working remotely at bigger fractions
 - Fermilab not the preferred place for new hires; losing junior scientists who have more flexibility to move
- Monetary impact needs to be better quantified as well
 - Is there a plan on how to provide additional cell-phones laptops to colleagues who need to respond quickly and need a Fermilab device. Do we have a sense how much this will cost?



Policy on Bring Your Own Device

- Discussion between POB members and Cybersecurity POCs earlier this morning
 - Goal: No CUI (Controlled Unclassified Information) on personal devices
 - Policy needs to be rolled out by June 1, 2024 as per FSO
 - A Lab-wide communications message has been drafted 3 weeks ago and is under review
 - In the meantime, new solution explored/under testing to allow read/write e-mails on personal devices but not copy or download within the “office” environment – this is expected to reduce the impact of this policy to FRAM personnel and users/affiliates
 - Work on the related Fermilab software to be installed expected to be completed by end of March
 - MDM Web page to be updated in 2-3 weeks after that



Policy on Bring Your Own Device

- The worked upon-solution is expected to work OK for MACs and Windows environments; Linux will be more complicated
- No budget foreseen to get Lab cell phones for everybody who does not want to download the Fermilab software on their personal devices
- The Fermilab Prohibited Products List can be found in: <https://cybersecurity-atwork.fnal.gov/fermilab-prohibited-products-list/>