### Information Protection Standards
#### Exemption Request Process

**Revision History**

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<td>08/15/2012</td>
<td>1.0</td>
<td>Initial Release</td>
<td>Bruce Coulter</td>
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Information Protection Standards
Exemption Request Process

Purpose

This document describes the process that is to be followed for requesting an exemption to any of Madison Area Technical College’s Information Protection Standards.

It has been recognized that there may be instances where the unique needs of various faculty and/or staff of the college dictate the necessity to accept the risk that goes along with permitting those faculty or staff to be exempt from specific controls defined in the standards document. In addition, some circumstances may warrant the use of alternative protective controls to help mitigate any risk that is inherent with granting a requested exemption.

Scope

This process may be used to request an exemption from any of the standards – or individual controls defined within any standard – as defined in the “Madison Area Technical College information Protection Standards” document.

Exemptions may be requested for a specific individual, or may also be requested for an entire department, work group, or other subset of employees of the college.

General Information

The process involves the completion of a form requesting the exemption. The form includes basic information regarding the requestor, reasons why the exemption is needed, requested duration of the exemption, and a description of any compensating controls which will be implemented.

Any individual may make an exemption request for themselves, but requests on behalf of a work group, department, or any other group of employees must be made by the manager of that work group or department. The requestor will then need to obtain signatures from both their immediate supervisor and that person’s supervisor (the next level of management) to show their support for granting the exemption requested.

Completed request forms are submitted to the Chief information Security Officer who will review the request, make approval/denial decisions and communicate these decisions back to the requestor as appropriate. The Chief information Security Officer may confer with technology experts, the Chief information Officer, members of the Executive Team, or others before the approval/denial decision is made.
Step by Step Process

1. The requestor must complete Section 1 of the “Exemption Request Form”. (The form is an electronic form in MS-Word format, so there is no need for creation of a printed “hard-copy” version in order to fill out the form). It is important to note that anyone may request an exemption for themselves, but any request for an exemption for a department or work group must come from the manager of that department or work group.

2. Completed request forms should be submitted to the immediate supervisor of the requestor for review.

3. The requestor’s supervisor should review the request. If they support approval of the request, the supervisor should sign the form in the appropriate space to indicate their support and acknowledgment of the inherent risks associated with granting the exemption. The supervisor should then forward the request to their immediate supervisor (the next level of management) for further consideration. (Note: Forwarding to the next level of management is not necessary if the immediate supervisor of the requestor is a member of the College’s Executive Management Team).

4. If the supervisor of the requestor’s supervisor also supports granting the exemption, they should also sign the form in the appropriate space to indicate their support and acknowledgement of the inherent risks associated with granting the exemption. The completed form (with signatures) should then be forwarded to the Chief Information Security Officer for final review and consideration. (At this point, the form should be scanned and an electronic version of the of the completed form submitted as an e-mail attachment).

5. Upon receipt, the Chief Information Security Officer will review the request form for completeness and clarity. If acceptable, the requestor will be notified of receipt of the request and given an estimate of how long before a response can be expected. Under normal circumstances, a response can generally be expected within 10 business days of submission of the request. However, actual response time may vary based on the complexity of the request, availability of resources required for evaluation, volume of requests received, or other unforeseen factors.

   If the request is deemed to be incomplete or requires additional explanatory or other information, the request will be returned to the submitter, along with an explanation of what other information is required before the request can be properly evaluated.

6. The Chief Information Security Officer will review requests – evaluating the documented reasons for the exemption being requested vs. the risk to the college of approving the request. This evaluation may require further consultation with personnel from other areas – including Human Resources, Legal, Finance, Technology Services or others who may be called upon to offer opinions. Discussion and consultation with the Chief Information Officer or members of the Executive Team may also be required before a decision is
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reached to approve or deny the request.

7. After the approve/deny decision has been made, the Chief Information Security Officer will complete Section 2 of the form, documenting the decision made and reasons for it. Copies of this completed form will then be forwarded to the requestor and those individuals who provided signatures indicating their support for granting the exemption.

Copies of all requests – including the approve/deny decisions and reasoning will be kept on file for future reference. In addition, pertinent summary information regarding any approved exemptions will be kept in a separate file.