

Information Technology Policy

IT Waiver Review Process

ITP Number ITP-BUS004	Effective Date August 4, 2011
Category Business	Supersedes ITP-EPM003
Contact RA-ITCentral@pa.gov	Scheduled Review May 2019

1. Purpose

Establish the [procedures](#) for requesting and approving waivers to Information Technology Policies (ITPs) published by the [Office of Administration, Office for Information Technology, Enterprise](#) through the [Commonwealth of PA Procurement and Architectural Review \(COPPAR\)](#).

2. Scope

This [Information Technology Policy \(ITP\)](#) applies to all departments, boards, commissions and councils under the Governor's jurisdiction. Agencies not under the Governor's jurisdiction are strongly encouraged to follow this ITP.

3. Policy

Adherence to IT Policies is necessary to conduct Commonwealth business as well as to protect the Commonwealth's interests and assets. There are times where circumstances require a waiver to an IT policy for a specific period. OA/OIT Enterprise has a waiver process in which an agency can request a waiver from the requirements of a specific ITP. The waiver process is comprised of four steps:

1. Waiver Request Submission
2. Waiver Review
3. Waiver Approval
4. Waiver Expiration

Waiver Scenarios Table reference document

Refer to the supporting document, RFD-BUS004A, *Waiver Scenarios Table* for a list detailing when waivers must be submitted. This table does not capture every scenario and should be treated as a reference only. Agencies should contact RA-ITCentral@pa.gov for additional guidance on waiver submission criteria when necessary.

3.1 Waiver Requests Submission

Who can submit IT policy waiver requests

The agency or delivery center representative may submit a waiver request to OA/OIT Enterprise by entering the pertinent information into COPPAR.

An agency under the Governor's jurisdiction may be required to submit an [IT policy waiver](#) request when deemed necessary by the Commonwealth CIO.

Waiver Justification Criteria

The following must be included in a waiver submission:

- a. Agency and name of the person requesting the waiver;
- b. The policy for which the waiver is being requested and the applicable section(s) of the policy requiring exemption;
- c. Identify the specific service, technology, or product for which the waiver is being requested (if applicable);
- d. Identify where the specific technology or product is relative to the technology maturity life cycle ([Technology Maturity Lifecycle \(TML\)](#)), where applicable;
- e. A technical or business case (in sufficient detail) that identifies the specific action and how the request warrants exemption based on internal risks, cost, and/or business impact assessments results;
- f. The impact if the waiver is not approved;
- g. Any supporting documentation as required in the policy for waiver submissions;
- h. Completed OPD-BUS004A IT Policy Waiver Attestation;
- i. Additional documentation upon the request of COPPAR Reviewers.

During the COPPAR waiver review process, it may be determined that additional documentation may be required to assist COPPAR reviewers in their assessment to render a final decision. This is done on a case-by-case basis and facilitated through the COPPAR Request for Information Process (RFI).

Submission Deadlines

Waiver requests should be submitted at least twenty (20) business days prior to the date when a decision on the waiver request is required. Requests submitted with less than twenty (20) business days' notice or do not have the required or sufficient information for the review process are not guaranteed to be fulfilled in time.

3.2 Waiver Review

OA/OIT Enterprise along with SMEs will review waiver requests.

3.3 Waiver Approval

Approved waivers are valid for a period of two (2) years for all policy domains, except for Security Domain policies, which are valid for a period of one (1) year.

OA/OIT Enterprise, at its discretion, may require agencies to follow specific conditions detailed in an approved waiver request notification letter. The agency is responsible for ensuring the conditions of waiver approval have been satisfied to prevent OA/OIT Enterprise from rescinding the waiver.

OA/OIT Enterprise, at its discretion, may approve a different waiver expiration length for any policy.

OA/OIT Enterprise will notify the agency of its determination on the waiver request, which will detail any conditions and the approved waiver length.

3.4 Waiver Expiration

An ITP must be followed upon expiration of its waiver. If no renewal request is received in COPPAR, the waiver will terminate upon its expiration date.

A waiver renewal request does not cover any gap from a previously expired waiver. It is prudent that agencies submit a renewal waiver request at least twenty (20) business days prior to the current waiver's expiration date.

4. Responsibilities

- a. Office of Administration, Office for Information Technology Enterprise (OA/OIT Enterprise)** is the owner and manager of the COPPAR platform and governance processes and is the decision-making authority on all COPPAR IT Policy Waiver requests.
- b. Delivery Centers and their respective agencies** are to receive the appropriate internal attestations from the Delivery Center Chief Technology Officer, Delivery Center Chief Information Security Officer, Delivery Center Solutions Manager or designee (for Business/Software domain ITPs), and Delivery Center Chief Information Officer prior to submission of an IT waiver request to OA/OIT Enterprise via the COPPAR platform. *OPD-BUS004A IT Policy Waiver Attestation* must be completed and uploaded as part of waiver request.
- c. Independent agencies** are to receive the appropriate internal attestations from information technology leadership, including the agency Chief Technology Officer (or designee), agency Chief Information Security Officer (or designee), agency Solutions Manager or designee (for Business/Software domain ITPs), and agency Chief Information Officer prior to submission of an IT waiver request to OA/OIT Enterprise via the COPPAR platform. *OPD-BUS004A IT Policy Waiver Attestation* must be completed and uploaded as part of waiver request.

5. Related ITPs/Other References

Definitions of associated terms of this policy are published on the Office of Administration's public portal: <http://www.oa.pa.gov/Policies/Pages/Glossary.aspx>

Commonwealth policies, including Executive Orders, Management Directives, and IT Policies are published on the Office of Administration's public portal:

<http://www.oa.pa.gov/Policies/Pages/default.aspx>

- Management Directive 205.34 - *Commonwealth of Pennsylvania Information Technology Acceptable Use Policy*
- OPD-BUS004A – *IT Policy Waiver Attestation*
- RFD-BUS004B – *Waiver Scenarios Table*
- ITP-BUS000 – *Information Technology Policy Governance*
- ITP-PRO001 – *IT Procurement Review Process*
- [Technology Evaluation Planning Toolkit](#) (CWOPA Access Only)
- [COPPAR Manual Process document](#) (Limited Access Only)

6. Authority

Executive Order 2016-06, Enterprise Information Technology Governance

7. Publication Version Control

It is the user's responsibility to ensure they have the latest version of this publication, which appears on <https://itcentral.pa.gov>. Questions regarding this publication are to be directed to RA-ITCentral@pa.gov.

This chart contains a history of this publication's revisions:

Version	Date	Purpose of Revision
Original	08/04/2011	Base Document
Revision	08/21/2015	<ul style="list-style-type: none"> • Migrated policy into new ITP format; added Background, Definitions sections • Revised Section 4 Policy language for clarity and added <ul style="list-style-type: none"> ○ 4 stages of Waiver Process ○ Criteria for submission of waiver request • Changed the waiver period for Security Domain ITPs to one (1) year while leaving the remaining waiver length of two (2) years as the default for all other ITP domains • Removed OIT Memoranda and Management Directives from list of documents suitable for a waiver • Added language to enable OA-OIT to approve any waiver expiration length for IT policies • Added language that the Commonwealth CIO may request a waiver request from any agency in Governor's jurisdiction • Added language that any COPPAR waiver requests needed before 20 business days is not guaranteed to be processed in time • Clarifying language regarding expiration of waiver gap coverage • Removed language from Section 8 and replaced with "Not Applicable for this IT Policy" • Added supporting document RFD-BUS004A Waiver Scenarios Table information • Added additional References • Expanded waiver submission requirements • Expanded waiver approval details
Revision	07/22/2016	<ul style="list-style-type: none"> • Removed IT Policy Lifecycle reference, replaced with ITP-BUS000 reference • Revised "Access" to "Accessibility" in the ITP Domains table • Added boilerplate language on location of published Commonwealth policies
Revision	04/17/2017	<ul style="list-style-type: none"> • Removed "Application" domain, replaced with "Software" in Information Technology Policy definition • Minor clarifications throughout
Revision	05/25/2018	<ul style="list-style-type: none"> • Added Responsibilities section • Migrated Definitions to Policy Glossary, linked relevant terms throughout • Added OPD-BUS004A to ITP for required Attestation language
Revision	07/09/2018	<ul style="list-style-type: none"> • Updated RFD-BUS004A to RFD-BUS004B