# Information Technology Policy

## Information Security Policy

<table>
<thead>
<tr>
<th>ITP Number</th>
<th>Effective Date</th>
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<tbody>
<tr>
<td>ITP-SEC000</td>
<td>May 2016</td>
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<tr>
<th>Category</th>
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<tr>
<td>Security</td>
<td>None</td>
<td><a href="mailto:RA-ITCentral@pa.gov">RA-ITCentral@pa.gov</a></td>
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1. **Purpose**

This Information Technology Policy (ITP) establishes a program to ensure that the Commonwealth meets or exceeds its legal and ethical responsibilities for securing its IT Resources including, but not limited to, its critical and sensitive information technology resources. This ITP is necessary to ensure that the Commonwealth:

- Establishes an enterprise-wide approach to information security, including appropriate security awareness training, and education.

- Complies with federal and state guidelines and regulations regarding the collection, maintenance, use, and security of IT Resources.

- Provides a mechanism for agencies to collaborate with the Office of Administration, Office for Information Technology (OA/OIT) on new and emerging technologies in order to effectively develop and share enterprise and security architecture deliverables by:
  
  - Establishing and implementing prudent, reasonable, and effective practices for the protection and security of IT Resources, resources which includes the protection of sensitive and confidential information against accidental or deliberate unauthorized disclosure, modification, or destruction.
  
  - Developing information security policies and effective mechanisms for responding to incidents, breaches or misuse of IT Resources.
  
  - Providing a minimum level of Information Technology (IT) security requirements that have been determined acceptable for the transmission, processing, and storage of sensitive system data and business processes.
  
  - Reducing the overall and specific risks of breach or misuse of Commonwealth IT Resources and the damages and costs associated with a breach or misuse.

2. **Scope**

This 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. Definitions

3.1 **Enterprise Information Security Office (EISO):** Office within OA/OIT tasked with managing the enterprise IT security posture for the Commonwealth as it pertains to governance, risk, and compliance.

3.2 **Federal Information Processing Standards (FIPS):** A federal IT standard established by the NIST.

3.3 **IT Resources:** Include, but are not limited to, the staff, software, hardware, systems, services, tools, plans, data, and related training materials, and documentation that in combination support business activities. Examples of IT Resources include, but are not limited to, desktop computers, mobile devices, email, telephones, servers, and network switches/routers.

3.4 **National Institute of Standards and Technology (NIST):** A division of the federal Department of Commerce tasked with research and the establishment of federal IT standards.

3.5 **Offshore:** Any country or territory outside the Continental United States or Hawaii.

3.6 **CONUS:** Any of the Continental United States and Hawaii.

4. Policy

OA/OIT is responsible for protecting the Commonwealth’s IT Resources in accordance with all applicable federal and state guidelines and regulations; as well as, with effective information security practices and principles generally accepted as “due diligence” within the business community.

All agencies must comply with Commonwealth Information Security Policies. Information Security Policies are identified as ITPs by the Security (SEC) designation.

Appropriate action will be taken when loss, damage, or breach of confidentiality results from non-compliance with Commonwealth policies and Management Directives. Any agencies found to be in non-compliance with ITPs must employ immediate corrective actions. Agencies must also have compliance and risk management methodology in place to ensure agencies are maintaining compliance, remediating vulnerabilities and reducing IT security risks.

In the absence of existing policies or procedures that cover new or existing security implementation, the Commonwealth will follow industry security best practices and/or well-known security standards such as the FIPS and Special Publications (SP) published by the NIST. If there is not a Security ITP that covers the scope of the security implementation, agencies must submit a waiver for this policy accompanied by the specific proposed solution through the policy waiver process for review by EISO. Refer to Section 8 and ITP-BUS004 *IT Waiver Review Process* for guidance on the policy waiver process.

4.1 **Offshore Access**

Offshore access to Commonwealth production systems, whether hosted by the Commonwealth or by third parties, is prohibited by anyone not physically located in CONUS. This includes, but is not limited to:

- Virtual Private Network (VPN);
- Remote desktop;
- Virtual Desktop Infrastructure (VDI);
• Cloud infrastructure such as Infrastructure as a Service (IaaS), Platform as a Service (PaaS), and Software as a Service (SaaS) offerings; and
• All access to Commonwealth “C” designated data, as defined in ITP-SEC019.

It is required that all Commonwealth “C” designated data, as defined in ITP-SEC019, reside in CONUS where it is subject to the laws and regulations of the United States and the various jurisdictions within the United States. Transmission to Offshore systems or storage on Offshore systems is prohibited.

1) Offshore direct remote access to “C” designated data on any Commonwealth production system is prohibited regardless of the file type or storage medium. This includes, but is not limited to:
   • Databases;
   • Documents (PDF, Word, Text, etc.);
   • Spreadsheets; and
   • Images.

2) Offshore direct remote access to networking equipment (including but not limited to routers, switches, firewalls, etc.) which could be changed to gain access to “C” designated data on any internal system in the Commonwealth is prohibited.

Offshore work will be strictly limited to lower and test environments. There should be no Offshore access to production servers or to production environments. Offshore resources will only receive test or anonymized data that is not traceable or linkable to “C” designated data. Offshore resources should have no access to production data.

Offshore work should be performed in accordance with the OPD-SEC000A Security Requirement Traceability Matrix. All maintenance and support after system implementations should be performed by resources located and authorized to work within CONUS. Offshore resources should not be used for any post go live support.

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

• National Institute of Standards and Technology (NIST) Special Publications (SP) - http://csrc.nist.gov/publications/PubsSPs.html


6. Authority
Executive Order 2016-06 Enterprise Information Technology Governance

7. Publication Version Control
8. **Exemption from This Policy**

In the event an agency chooses to seek an exemption from the guidance within this IT policy, a request for a policy waiver is to be submitted via the enterprise IT policy waiver process. Refer to ITP-BUS004 *IT Waiver Review Process* for guidance.

This chart contains a history of this publication’s revisions. Redline documents detail the revisions and are available to CWOPA users only.

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Purpose of Revision</th>
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<tr>
<td>Original</td>
<td>05/19/2016</td>
<td>Base Document</td>
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<tr>
<td>Revision</td>
<td>05/07/2020</td>
<td>Clarified language throughout Revised Definitions section Added Exemption section Removed references to COPPAR throughout Offshore Access added OPD-SEC00A Security Requirement Traceability Matrix created</td>
<td>Revised ITP Policy Redline &lt;05/07/2020&gt;</td>
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It is the user’s responsibility to ensure they have the latest version of this publication, which appears on [https://itcentral.pa.gov](https://itcentral.pa.gov) for Commonwealth personnel and on the Office of Administration public portal: [http://www.oa.pa.gov/Policies/Pages/default.aspx](http://www.oa.pa.gov/Policies/Pages/default.aspx). Questions regarding this publication are to be directed to RA-ITCentral@pa.gov.