Information Technology Policy
IT Policy Waiver Review Process

Number	**Effective Date**
ITP-BUS004	August 4, 2011
Category	**Supersedes**
Business	ITP-EPM003
Contact	**Scheduled Review**
RA-ITCentral@pa.gov	April 2025

1.   Purpose

This Information Technology Policy (ITP) establishes and maintains the policy and procedures for requesting, reviewing, and rendering a decision on waivers to published ITPs.

2.   Scope

This ITP applies to all departments, offices, boards, commissions, and councils under the Governor's jurisdiction (hereinafter referred to as "agencies") as well as agencies not under the Governor's jurisdiction that utilize Office of Administration, Office for Information Technology (OA/IT) to provide IT services.

Third party vendors, licensors, contractors, or suppliers shall meet the policy requirements of this ITP as outlined in the Responsibilities section.

3.   Policy

Adherence to ITPs is required in order to protect the Commonwealth's IT Resources and mitigate business and IT risks, however, there may be circumstances where an IT policy needs to be waived for a specific period. In these instances, OA/IT has an IT Policy Waiver process in place, which allows agencies to request an exemption from the requirements of a specific ITP. The IT Policy Waiver process is comprised of five sub-processes, which are outlined in the subsections below.

3.1 Waiver Request Submission

Agencies shall submit an IT Policy Waiver request when they are not able to comply with the requirements of an ITP or when deemed necessary by the Commonwealth CIO and/or other governing entities.

Refer to the Scenarios Table in supporting document RFD-BUS004B, IT Policy Waiver Reference Document, for a list detailing situation when IT Policy Waiver requests must be submitted and their relevant requirements. 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.

3.1.1 Who can submit IT policy waiver requests?

Agencies shall coordinate and collaborate with their designated IT Policy Waiver submitters to facilitate gathering information and required artifacts for the submission of a request to OA/IT by entering the pertinent information via the enterprise IT Policy Waiver system.

3.1.2 Waiver Request Submission Criteria

IT Policy Waiver submitters should provide the required submission details as outlined in the *TIPR Guideline Document* (Commonwealth Access only), and *RFD-BUS002B, IT Policy Waiver Reference Document,* to ensure that the request follows the appropriate approval workflow.

Multiple policies within the same domain can be included in one IT Policy waiver submission, however, a separate submission is required for each domain.

If an IT Policy Waiver is intended to apply to more than once agency, it must be indicated in the request at the time of submission.

An IT Policy Waiver intended to apply to the entire Enterprise shall be submitted by a designated Enterprise submitter.

3.1.3 Submission Deadlines

Please allow for a twenty (20) business day review cycle for Routine requests and fourteen (14) business day review cycle for Expedite requests for Enterprise Reviewers. IT Policy Waiver requests should be submitted at least twenty (20) business days prior to the date when a decision on the IT policy waiver request is required. Requests submitted with less than twenty (20) business days' notice or that do not have the required or sufficient information for the review process are not guaranteed to be fulfilled in time.

3.2 Waiver Request Review

Appropriate Independent Agency or Delivery Center Reviewers and OA/IT will review all IT Policy Waiver requests. During the IT Policy Waiver review process, it may be determined that additional documentation may be required to assist IT Policy Waiver reviewers in their assessment to render a final decision. This is done on a case-by-case basis and facilitated through the IT Policy Waiver RFI process. The requesting Submitter is responsible to coordinate and reply to a RFI in a timely manner to avoid delays of an IT Policy Waiver request decision and provide comments or artifacts to satisfy the RFI.

3.3 Waiver Request Decision

The enterprise IT Policy Waiver Review system will notify the Submitter of the determination on the IT Policy Waiver request, which may detail conditions of approvals with dues dates, and the approved waiver length.

By default, approved IT policy 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/IT Domain Owners, at their discretion, may approve a different IT policy waiver expiration length for any policy.

3.4 Waiver Conditions of Approval

OA/IT Domain Owners, at their discretion, may add Conditions of Approvals for IT Policy Waivers with specific due dates to verify compliance detailed in an approved IT Policy Waiver notification letter. The agency is responsible for ensuring that the conditions of approval have been satisfied in coordination with the Submitter to mitigate risks and prevent OA/IT from rescinding the waiver.

3.5 Waiver Expiration/Rescission

The IT Policy Waiver Review system will notify the Submitter in advance of the upcoming expiration of a waiver. The Submitter will have the opportunity to resubmit a renewal prior to the expiration date. If a renewal is not submitted and approved prior to the expiration date, the associated IT policy waiver will expire.

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

In addition to the right to rescind a waiver due to non-compliance with Conditions of Approval as detailed in 3.4 Waiver Conditions of Approval section, OA/IT Domain Owner, at their discretion, and for any reason, can rescind an active IT Policy Waiver. OA/IT shall communicate the decisions to rescind to the agency in a timely manner. The following personnel hold decision rights to rescind an IT policy waiver:

- Commonwealth Chief Information Officer (CIO)

- Commonwealth Chief Information Security Officer (CISO)

- Commonwealth Chief Technology Officer (CTO)

- OA/IT Domain Owner

4. Responsibilities

4.1 Agencies shall

- Adhere to the requirements outlined in this ITP.

- Coordinate with the designated IT Policy Waiver Submitter, appropriate Stakeholders and agency legal counsel to facilitate gathering information and required artifacts per policy guidance.

- Respond in a timely manner to the IT Policy Waiver Submitter with comments or artifacts to satisfy the RFI or participate in the request for a formal meeting if necessary.

- Respond in a timely manner to the IT Policy Waiver Submitter with comments or artifacts to satisfy the Conditions of Approval.

- Track IT Policy Waiver Conditions of Approval due dates and IT Policy Waiver expiration dates.

4.2 OA/IT Policy Waiver Submitters shall

- Coordinate with agencies to submit IT Policy Waiver submissions and required artifacts.

- Coordinate with agencies to satisfy RFIs and Conditions of Approval.

- Track IT Policy Waiver Conditions of Approval due dates and IT Policy Waiver expiration dates.

4.3 OA/IT Domain Owners shall:

- Have decision rights on all IT policy waiver requests.

- Provide oversight, review, and approval of IT Policy Waivers.

- Ensure alignment with the controls, standards, and industry best practices in protecting Commonwealth IT Resources.

4.4 Third-party vendors, licensors, contractors, or suppliers shall:

- Coordinate with the appropriate agency point of contact to facilitate a timely submission of an IT Policy Waiver with the appropriate information and required artifacts as outlined in this policy and RFD-BUS002B *IT Policy Waiver Reference Document*.

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 Amended Commonwealth of Pennsylvania Information Technology Acceptable Use Policy*

- *RFD-BUS004B, IT Policy Waiver Reference Document*

- *ITP-ACC001, Digital Accessibility Policy*

- *ITP-BUS000, Information Technology Policy Governance*

- *ITP-BUS002, IT Investment Review Process*

- *TIPR Guideline Document* (Commonwealth Access Only)

6. Authority

Executive Order 2016-06, Enterprise Information Technology Governance

7. Publication Version Control

It is the Authorized User's responsibility to ensure they have the latest version of this publication, which appears on https://itcentral.pa.gov for Commonwealth personnel and on the Office of Administration public portal: https://www.oa.pa.gov/Policies/Pages/default.aspx. Questions regarding this publication are to be directed to RA-ITCentral@pa.gov.

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

Version	Date	Purpose of Revision	Redline Link
Original	08/04/2011	Base Document	N/A
Revision	08/21/2015	• Migrated policy into new ITP format; added Background, Definitions sections. • Revised Section 4 Policy language for clarity and added. ○ 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	N/A
Revision	07/22/2016	• 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	N/A
Revision	04/17/2017	• Removed "Application" domain, replaced with "Software" in Information Technology Policy definition. • Minor clarifications throughout	N/A
Revision	05/25/2018	• Added Responsibilities section. • Migrated Definitions to Policy Glossary, linked relevant terms throughout. • Added OPD-BUS004A to ITP for required. Attestation language	N/A
Revision	07/09/2018	• Updated RFD-BUS004A to RFD-BUS004B	N/A
Revision	03/20/2020	• Removed references to COPPAR throughout • Removed "Enterprise" throughout. • Clarified language throughout. • Added Rescission decision rights guidance. • Revised ITP title	N/A

Version	Date	Purpose of Revision	Redline Link
Revision	09/23/2021	- Added Third-Party vendors to Scope and Responsibilities Sections - Added Wavier Conditions of Approval as an additional sub-process. - Waiver Request Justification Criteria renamed to Waiver Request Submission Criteria - Updated steps to align with the new questions for the IT Policy Waiver Review Process - Added Routine and Expedited review cycle days. - Updated Responsibilities Section - Removed RFD-BUS004A IT Policy Waiver Attestation document. - Updated RFD-BUS004B IT Policy Waiver Reference - Document	N/A
Revision	03/04/2022	- Utilizing new accessible document template - Updated RFD-BUS004B IT Policy Waiver Reference - Added reference to ITP-ACC001 Digital Accessibility Policy	N/A
Revision	04/01/2024	- Updated scope - Added guidance for waivers affecting more than agency and enterprise-wide waivers - Removed duplicative or unnecessary policy language - Misc. grammatical updates	Revision ITP Redline <04/01/2024>