Standard for Delegated Authority for Procurement of Low-Risk Software and IT Services

1. Purpose

This document specifies the process for procurement of low-risk software and IT services and the requirements for the procurement to be considered "low risk." Accordingly, any software or service that processes and/or stores moderate or high risk data, such as student data with FERPA compliance requirements, is excluded and must be procured through the standard software review process to ensure protection as required by university policy and associated IT security standards.

2. Scope

University personnel at the level of Department Head or above (as defined by Senior Management areas) are delegated the authority to sign contracts and make procurements of low-risk software and IT services, including "click-through" agreements, that do not go through IT Procurement or the university's Procurement Department.

3. Standard

Such procurements must follow the process below and must meet all requirements for a low-risk procurement. A request must be made through IT Procurement (https://itpals.vt.edu/) to procure any software and IT service that does not meet all requirements to be considered "low risk."

Process for a Low-Risk Procurement

- The department wishing to procure software or an IT service must assess if the planned procurement meets all requirements for a low-risk procurement as specified below. Consultation with IT Procurement is available via email to lowrisksoftwareprogram-g@vt.edu, but not required. Note that consultation does not absolve the department and/or approver of responsibility for any risks incurred

- Department personnel (especially the requestor and approvers) involved in the low-risk software procurement and its subsequent use should complete training that is currently available on PageUp and takes about 30 minutes to complete.

- The department must first register the planned procurement in ServiceNow, which can be done from the IT Procurement website, https://itpals.vt.edu/. The Department Head must approve the planned procurement to indicate that it meets all requirements for low-risk procurement, agree to all terms and conditions for the software or IT service, and acknowledge that there will not be other reviews of the software, IT service, or any associated terms and conditions. Reports of software and IT services procured through this process will be provided to IT Procurement for review and software inventory. Past purchases made through this process are subject to review and audit.

- The procurement may then be completed using HokieMart, via a purchasing card (P-Card), or through an online "click-through" agreement if a payment is not required. Normal rules and cost limits for HokieMart or P-Card procurements apply.

<u>Requirements for a Low-Risk Procurement</u>

A procurement is "low risk" if it meets <u>all</u> of the following criteria.

1) **Cost:** The cost of the software, IT service, or associated license or subscription must be at or below $10,000 on a one-time or annual basis.

2) **Data:** The software or IT service must process and/or store only "low risk" data as defined by the [Virginia Tech Risk Classification standard](). The software or IT service must not process and/or store any high or moderate risk data. High and moderate risk data includes any personally identifying information for students, employees, or others. The software or IT service must not process and/or store any data that is subject to a data sharing or similar agreement. The software or IT services must not process and/or store any data that is subject to contracts, regulations, or laws such as FERPA and ITAR. The software or IT services must not facilitate the collection or distribution of money on behalf of the university.

3) **Impact:** The software or IT service must be used only within a single Senior Management area or research project (investigators may be from multiple units); must not have a data integration with Banner, Blackbaud, Canvas, or other university enterprise software system; must not have a data integration with a system that is processing and/or storing any data that is not low risk as defined by the Virginia Tech Risk Classification standard; and must not be essential to a university-wide service or function.

4) **Vendor:** The software or IT service must not be purchased from a vendor or from a country with which Virginia Tech is prohibited from purchasing products or services. Note that all purchases processed through HokieMart are checked automatically to ensure a vendor is authorized to do business with the university. A list of university software resellers under contract with the university can be found here: https://www.procurement.vt.edu/itresellers.html

When selecting software, consideration should be given to applicable standards and laws, including those applying to accessibility (see [Policy 7215 Information Technology Accessibility]() for details). Questions on this procedure should be directed to ITPALS at lowrisksoftwareprogram-g@vt.edu.

4. References

Virginia Tech Risk Classifications Standard
https://it.vt.edu/content/dam/it_vt_edu/policies/Virginia-Tech-Risk-Classifications.pdf

University Contract Signature Policy and Procedures Policy #3015
https://policies.vt.edu/assets/3015.pdf

Information Technology Accessibility
https://policies.vt.edu/7215.pdf

Low-Risk Software Procurement Training
https://vtemployees.pageuppeople.com/learning/8307

5. Maintenance of Standard

The Office of the VPIT&CIO is responsible for this IT Standard. Questions may be directed to vpit@vt.edu.

6. Revisions

- August 1, 2022 version 1 posted and effective.
- January 2023 version 2 removes references to pilot program and updates training resource and email address for assistance. It also emphasizes the importance of data risk classification.