



INTERNATIONAL  
**TRADE**  
ADMINISTRATION

# INFORMATION TECHNOLOGY MANAGEMENT POLICY



TECHNOLOGY, SERVICES AND INNOVATION

Office of the Chief Information Officer (OCIO)  
Policy and Strategic Planning (PSP)

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**Revision History**

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02/07/19	.1	Creation of information Technology Management Primary Policy	Lois Mockabee
6/14/2019	1.0	Final Draft	Tim McGrail

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## **INFORMATION TECHNOLOGY MANAGEMENT**

### **1. PURPOSE**

The International Trade Administration (ITA), Technology, Services and Innovation (TSI) Information Technology (IT) <sup>1</sup> Primary Policy document explains the roles and responsibilities of all TSI directorates and their role in enabling the ITA mission through the innovative use of technology.

### **2. BACKGROUND**

TSI will develop a mechanism for establishing clear priorities, ensuring organizational buy-in, and effectively sharing the burden of change management within the organization. The goal of this document is to strengthen IT operations by developing common policies, guidance and standard operation procedures.

### **3. SCOPE AND APPLICABILITY**

All TSI and ITA Directorates including contractors.

### **4. ORIGINATOR**

Technology, Services and Innovation (TSI), Office of the Chief Information Officer

### **5. POLICY**

It is the policy of the ITA that the Administration and its business units plan, acquire, manage, and use information technology (IT) and information in a secure manner that enhances mission accomplishment, improves the work processes and employee productivity, provides enough protection for the privacy of personal information and complies with all applicable federal laws, and directives.

The primary focus is to provide a general direction of how TSI operates based on the defined roles and responsibilities and to ensure the following:

- Communicate the framework for implementing IT governance to stakeholders
- Inform and align decision-making for IT planning, policy, and processes and ensure that leadership agrees on the level of risk

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<sup>1</sup> **“Electronic and Information Technology”** is any IT, equipment, or interconnected system or subsystem of equipment for which the principal function is the creation, conversion, duplication, automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, reception, or broadcast of data or information.

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- Ensure risks are managed appropriately and resources are used strategically
- Provide a formal governance framework to ensure business requirements drive decisions Clearly defining the roles and responsibilities of the ITA Information Technology Leadership;
- Adopting and implementing best practices of governance in full conformity with the letter and spirit of all applicable laws, rules and regulations.
- Creating IT Oversight areas for TSI to provide IT management:
  1. [Information Technology Strategy Oversight](#)
  2. [Information Technology Investment Oversight](#)
  3. [Information Technology Acquisition Oversight](#)
  4. [Information Technology Workforce Oversight](#)
  5. [Information Technology Enterprise Architecture Oversight](#)
  6. [Information Technology Information Oversight](#)
  7. [Information Technology Services Oversight](#)
  8. [Information Technology Customer Relations Oversight](#)
  9. [Information Technology Security Oversight](#)
  10. [Information Technology Accessibility Oversight](#)

**6. ROLES AND RESPONSIBILITIES**

**A. Department of Commerce (DOC) Office of the Chief Information Officer (CIO)<sup>2</sup>**

1. Ensures that the Department’s programs fully and appropriately utilize information technology. The OCIO also supports increased use of leading-edge technology that enables the Department to achieve its mission to provide improved products and services at lower costs to internal and external stakeholders
2. The CIO defines the development processes, milestones, review gates, and the overall policies for all capital planning, enterprise architecture, and project management and reporting for IT resources.
3. Provides leadership and accountability for IT management, governance, and oversight process across the DOC
4. In accordance with the DOC FITARA assignment plan delegate authority from the DOC CIO to the ITA CIO. Under the FITARA legislation and Office of Management and Budget (OMB) Memorandum 15-14 and using the checklist in Part A of the FITARA CIO Assignment Plan.

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<sup>2</sup> “Chief Information Officer” in this document is the person within the ITA accountable for IT management as defined in this policy statement.

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**B. ITA TSI Leadership**

Ensure Information Management and Information Technology (IM/IT) strategies and solutions are applied to meet the rapidly changing needs of our customers while enhancing their ability to help U.S. businesses export to global markets, attract foreign investment, and benefit from the enforcement of fair-trade agreements.

1. The **Chief Information Officer (CIO)** is appointed by the ITA Undersecretary and shall:
  - a. Provide leadership and accountability for IT management, governance, and oversight processes across the organization.
  - b. Advise ITA leadership on all matters pertaining to IT.
  - c. Develop and implement organization IT policy pursuant to the authorities and responsibilities set forth in this Primary Policy. Except where otherwise authorized by law, regulation, or other policy, the ITA CIO has the authority to set organization IT policy, standards, procedures, and guidance to ensure sound management practices in all areas of IT governance.
  - d. Ensures that IT investments, through the Capital Planning and Investment Control (CPIC) process, are integrated into the ITA budget formulation and execution processes.
  - e. The ITA CIO serves as the chair for the ITA IT Executive Sponsorship Committee (IT ESC).
  - f. In collaboration with the Chief Financial Officer (CFO), approves funding associated with IT investments in the ITA’s annual and multi-year planning, programming, budgeting, and executing processes and approves all IT requests for reprogram funding.
  - g. Provides executive-level oversight (monitoring costs, schedules, performance, and risks) of ITA’s most critical IT investments to ensure disciplined selection, management, and return on investments.
  - h. The CIO and **Deputy Chief Information Officer (DCIO)** shall routinely assess and determine the policies for TSI.
2. The **DCIO** assists the CIO in the strategic planning, management, and direction of IT programs, services, and policies, and:

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- a. Ensures that the ITA IT strategic plans demonstrate alignment with DOC’s IT strategic plan.
- b. Reviews, validates, and approve investments that meet established criteria, including portfolio placement and alignment.
- c. Directs and manages the day-to-day operations of ITA.
- d. Represents ITA on IT planning and operational task forces and committees as appropriate.
- e. Performs project management responsibilities, including developing logical and efficient project plans, establishing priorities, monitoring and managing task completion, anticipating and avoiding problems, and working collaboratively and cooperatively with team members and user groups to ensure project accountability.
- f. Provides leadership in evaluating complex technology strategies and developing strategic approaches that maximize city resources while bringing the best results.
- g. Develops and maintains best practices and standards in process, design, architecture<sup>3</sup>, and operations of all aspects of services-oriented information technology delivery.
- h. Identifies information technology issues and opportunities, analyzes problems and alternatives and develops sound conclusions and recommendations.
- i. Sets priorities and allocates resources to meet staff needs in a timely, effective manner.
- j. May act for the CIO in that individual's absence.

**C. ITA TSI Executive Board and Councils**

- 1. The ITA CIO serves as a member of the ITA Management Council (MC). The ITA MC is comprised of all Senior Leaders within the respective ITA Business Units. The MC communicates, collaborates, and coordinates ITA’s strategic Information

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<sup>3</sup> **“Organization Architecture”** is the process of translating business vision and strategy into effective organization change by creating, communicating, and improving the key requirements, principles, and models that describe the future state of the organization and enable its evolution.

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Management/Information Technology planning and aligns it to the overall ITA and DOC plans.

2. The ITA CIO serves as the Chair for the ITA IT Executive Sponsorship Committee.
3. The **ITA ESC** performs the following:
  - a. Provide executive-level oversight (monitoring costs, schedules, performance, and risks) of ITA’s most critical IT investments to ensure disciplined selection, management, and return on investments.
  - b. Review, validate, and approve investments that meet established criteria, including the review and validation of portfolio placement and alignment.

**D. Information Technology Strategy Oversight**

1. The ITA CIO and DCIO will implement a(n):
  - a. **IT Strategy.** Develop and implement an organization-wide IT Strategic Plan that supports ITA’s mission and goals, drives investment decisions, and monitors progress toward achieving its goals.
  - b. **Alignment.** Ensure that the IT strategic plans demonstrate alignment with ITA’s IT strategic plan.
  - c. **Designee.** Designate the Policy and Strategic Planning (PSP) Director to act on behalf of the ITA CIO and will oversee IT strategic management across the ITA
  - d. **Policy.** Click [HERE](#) to see the Information Technology Strategy Oversight Policy statement.

**E. Information Technology Investment Oversight**

1. The ITA CIO or Deputy CIO will implement a(n):
  - a. **Investment Performance.** Ensure that ITA monitors performance of major IT investments<sup>4</sup> and identify underperforming major IT investments<sup>5</sup>.

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<sup>4</sup> **“Major IT Investment”** is an IT investment that requires special management attention because of its; (1) importance to the mission or function of the government; (2) significant program or policy implications; (3) high executive visibility; (4) high development, operating, or maintenance costs; (5) unusual funding mechanism; or (6) designation as major by the ITA CIO as described in the capital planning and investment control process.

<sup>5</sup> **“Underperforming Major IT Investment”** is a major IT investment for a development, modernization, or enhancement project with a greater than 10% variance from meeting its schedule, cost, or performance targets.



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1. Participate in ITA reviews of IT major investments or designate an executive representative to participate, as appropriate.
  2. Refer underperforming major IT investments to the ESC.
  3. Monitor underperforming investments for improvement or termination.
  4. Notify the ESC of a major investment should be paused, re-scoped, or terminated.
  5. Ensure that accurate cost, schedule, risk, and performance data for all ITA major IT investments are made available to the public in a timely manner, per Office of Management and Budget guidance.
- b. **Project Management Practices.** Establish IT project management practices that promote standard development life cycles for ITA use. Ensure that reporting and security requirements relevant to IT project managers are easily accessible<sup>6</sup> and highlight required actions.
  - c. **Project Manager Qualifications.** Ensure that IT project managers are certified and qualified in accordance with Revision to the Federal Acquisition Certification for Program and Project Managers (FAC-P/PM).
  - d. **Designee.** The PSP and Project Management Office Directors are act on behalf of the ITA CIO to oversee IT investment management across the ITA,
  - e. **Policy.** Click [HERE](#) to see the Information Investment Oversight Policy statement.

## F. Information Technology Acquisition Oversight

1. The ITA CIO and DCIO will implement a(n):
  - a. **Acquisition Processing.** Establish organization processes and practices for all IT acquisitions that are integrated with ITA procurement policies, green purchasing requirements, and requirements for assurance of non-duplication of Administration e-government initiatives. The ITA CIO will be aware of, get to participate in, and influence all acquisition reviews that involve IT purchases

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<sup>6</sup> “**Accessibility (or Accessible)**” is the design of products, devices, services, or environments for people with disabilities. Accessible design ensures both “direct access” (i.e., unassisted) and “indirect access,” meaning compatibility with an individual’s assistive technology (e.g., computer screen readers).

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(hardware, software, telecommunications, services, etc.). Additionally, will ensure any acquisitions that do not include Bureau CIO review and approval are sent back to the ITA CIO for their examination.

- b. **Acquisition Plan Review.** Review and approve IT acquisition plans, strategies, and procurements. The ITA CIO will review and sign all acquisition plans over 10M in life cycle costs and will work with the ITA CFO with documenting their process for reviewing all procurements under 10M. Delegate approval authority, as appropriate.
- c. **Budget Formulation Process.** The OMB Circular A-11 guidance states the Department CIO and CFO must affirm the following statements: (1) A statement from the CIO affirming that the CIO has reviewed and approved major IT Investments as part of planning budgetary estimates, (2) A statement from the CFO and CIO affirming that the CIO had a significant role in reviewing planned IT support for major programs and significant increases and decreases in IT resources, and (3) a statement from the CIO and CFO that the IT Portfolio (Section 55.6) includes appropriate estimates of all IT resources.
- d. **Government-wide Contract Agreements.** Promote the use of government-wide and organization contracting vehicles across the organization. Ensure contracts are efficient and cost effective. Approve new agency-wide IT contracts and delegate authority to enter into agreement with vendors through their contracting officers for IT products and services.
- e. **Acquisition Checklists.** Ensure that the acquisition checklists include the required FITARA review for acquisitions over 10M in total life cycle costs.
- f. **Designee.** Designate the PSP and Resource Management Directors to act on behalf of the ITA CIO to oversee IT acquisition management across the ITA.
- g. **Policy.** Click [HERE](#) to see the Information Acquisition Oversight Policy statement.

**G. Information Technology Workforce Oversight**

- 1. The ITA CIO and DCIO will implement a(n):
  - a. **Federal Alignment.** Ensure that the ITA IT workforce is skilled and equipped to perform the work needed to maintain the current state of IT and is positioned to perform the work needed to achieve IT strategic goals.
  - b. **Grow Skill Base.** Assess IT workforce skills and competencies and determine gaps and areas for improvement. Develop and implement recruitment strategies to attract and hire the most qualified and competitive IT talent.

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- c. **Culture of Engagement.** Build an organization culture of engagement that promotes the exploration of new technologies, standards, and processes and rewards innovation.
- d. **Designee.** Designate the Resource Management Director to act on behalf of the ITA CIO to oversee IT workforce management across the ITA.
- e. **Policy.** Click [HERE](#) to see the Information Workforce Oversight Policy statement.

**H. Information Technology Enterprise Architecture (EA) Oversight**

- 1. The ITA CIO and DCIO will implement a(n):
  - a. **Federal Alignment.** Develop and maintain an EA that is aligned with the federal EA and align ITA’s IT investments with the EA.
  - b. **EA Reviews.** Develop and implement guidance and procedures for EA reviews of all IT investments and conduct EA reviews of major investments.
  - c. **Designee.** Designate the PSP Director to act on behalf of the ITA CIO to oversee IT enterprise architecture management across the ITA.
  - d. **Policy.** Click [HERE](#) to see the Information Technology Enterprise Architecture Oversight Policy statement.

**I. Information Technology Information Oversight**

- 1. The ITA CIO and DCIO will implement a(n):
  - a. **Internal Sharing.** Develop and implement strategies for managing organization data and information. Promote information sharing, as appropriate, throughout the organization and with external partners<sup>7</sup>.
  - b. **External Sharing.** Lead and coordinate information sharing between key federal agencies, between federal agencies and state and local law enforcement and judicial agencies, and between the United States and foreign partners.

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<sup>7</sup> “**External Partners**” refers to the partners and stakeholders outside ITA, such as other federal agencies; state, local, tribal, territorial, and international governments; private industry; grant organizations; and academia.

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- c. **Sharing Standards.** Build an information sharing reference architecture. Adopt consistent technical exchange standards and open community standards, wherever possible, to support content sharing between communities (both ITA and external partners) and applications.
- d. **Data Marketing.** Bring ITA together to maximize the use of existing ITA data and identify new sources and new uses for data.
- e. **Governance and Financial Data.** Share data captured through governing and financial processes with stakeholders, when appropriate, to improve transparency and foster stronger relationships.
- f. **Downstream Sharing.** Ensure that information is created across the organization in a manner that supports downstream information processing and dissemination when possible.
- g. **System interoperability and accessibility.** Ensure that information systems built across the organization promote interoperability and information accessibility.
- h. **Data Life-Cycle Management.** Strengthen data life cycle management across ITA, including release practices. Incorporate requirements for preservation, records management, accessibility, security, and privacy.
- i. **Privacy and Confidentiality.** Strengthen measures to ensure that privacy and confidentiality are fully protected, and that data are properly secured across the organization.
- j. **Data Analytics.** Enhance the use of organization data analytics to advance litigation, investigation, forensics, and business capabilities. Use these tools to detect financial fraud and strengthen security posture.
- k. **Electronic Records.** Ensure that electronic records within applications are appropriately retained and disposed of across the organization.
- l. **Burden Reduction.** Minimize the paperwork burden on private citizens in support of the PRA. Ensure that information collected from the public, across the organization, is limited to the minimum necessary for protection of the public, policy development, effective management, and planning and external reporting. Also, ensure that information is collected by the most efficient, effective, and economical means possible and promote the use of IT for collections.

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- m. **Designee.** Designate the Technology Transformation and Data Services and Digital Strategy Directors to act on behalf of the ITA CIO to oversee IT information management across the ITA.
- n. **Policy.** Click [HERE](#) to see the Information Technology Information Oversight Policy statement.

**J. Information Technology Services Oversight**

- 1. The ITA CIO and DCIO will implement a(n):
  - a. **Configuration Management Database (CMDB).** A CMDB provides a centralized view of IT operational hardware and software assets and their relationships to services, which in turn grants IT leaders more control over their infrastructure. TSI realizes that a properly designed, implemented, and populated CMDB is a necessary building block for creating other capabilities such as Service Management process standardization and a Service Catalog. Some of the uses of the CMDB will be to:
    - Track near real-time hardware assets to customer/owner relationships
    - Catalog and track software installed on hardware assets
    - Quickly identify dependencies between hardware, software issues, and service failures
    - Report up-to-date statuses on ITA services and assets
    - Control data to ensure it can only be changed by authorized individuals (security)
    - Verify the data through audits and reviews to ensure it is accurate (auditing).
  - b. **Service Catalog.** TSI will deliver a Service Catalog that provides an organized collection of IT-related services that are offered to customers. By presenting all our service capabilities in a catalog, we will provide our customers a single place to select and order the services they need. The catalog will contain a description of the service, service categorization, how to request the service, and in future iterations, pricing for the service. The TSI Service Catalog will contain all the services the organization currently offers to its internal and external customers. It will allow users to order any services available to them and, in most cases, will collect all the information needed for providing the service. The approval and fulfillment workflows will ensure that the services get delivered. The current request status is always available to the customer through monitoring of workflow states. An exception would be the case of a

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service request for a new capability to be built based on customer requirements. In that case, additional information/requirement collection will be required through the requirement/use case development phase of the project. The major benefits of a Service Catalog to TSI customers are the following:

- Customer satisfaction will increase through the efficient service ordering and delivery process.
- Deliver cost-savings due to pre-defined and automated (where possible) workflows that save time and improve accuracy.
- Since customers can self-order through the catalog instead of calling service desk, there will be reduction in service desk support requirements.
- The catalog will show all services offered to customers, so they are aware of all available options.
- Fulfillment workflows (including escalation and resolution of jeopardies) are part of the catalog, which provides greater transparency. This helps ensure tasks are fulfilled in a timely fashion and are not “stuck” in a workflow waiting for resolution.
- An up-to-date status of the service request and delivery is always available to the customer.

- c. **IT Service Management (ITSM) Process Standardization.** The current implementation of the TSI IT Services Oversight is heavily customized. ITA has embarked on an effort to take advantage of the enhanced capabilities available in newer releases of our Service Management tool. The new implementation, based on Out-of-the-Box capabilities, will take advantage of a CMDB by helping to automate and streamline IT incident and request management.
- d. **Self Service Portal.** TSI will deliver a Self-Service Portal that will provide a mobile-friendly self-service experience for users. This portal will assist in enhancing the user experience to drive user adoption of critical enterprise applications and capabilities. By offering tips and other forms of guidance, the portal will simplify the process for users to access specific platform features more easily.
- e. **Asset Management.** TSI will deploy an Asset Management capability to integrate the physical, technological, contractual, and financial aspects of ITA assets. The Asset Management system will allow ITA to provide Total Value Management (TVM). The Asset Management capability will benefit ITA in the following areas:

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- Provide accurate overall costs for each acquired unit for TVM
  - Manage, track, and control all IT inventory that is purchased and used
  - Offer complete visibility of ITA IT inventory through reports and dashboards
  - Reduce the cost of purchasing and managing assets
  - Manage the asset life cycle from planning to disposal
  - Achieve compliance with relevant standards and regulations
  - Gain greater insight needed to create standards and processes for managing assets
  - Expedite IT services to end users/customers due to easier tracking of inventory requests in one consolidated system vs. multiple systems
  - Optimize software license use via software asset & license management, which should reduce cost for ITA
  - Enhance our cybersecurity posture through the management of ITA hardware and software assets.
- f. **Service Delivery.** Monitor the delivery of organization services and collect customer satisfaction measurements. Use measurements to identify services for improvement or retirement.
- g. **Designee.** Designate the PSP, Enterprise Applications, and Enterprise Operations Directors to act on behalf of the CIO to oversee IT services management across the ITA.
- h. **Policy.** Click [HERE](#) to see the Information Technology Services Oversight Policy statement.

## **K. Information Technology Customer Relations Oversight**

1. The ITA CIO and DCIO will implement a(n):
  - a. **Customer Success.** Under the direction of the Customer Success Director, establishes an ITA integrated, multi-level support service that is available 24

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hours a day, 7 days a week, and promotes quick and accurate resolution of both simple and complex requests to enhance productivity.

- b. **Customer Life-Cycle Services.** Establish consistent organization life cycle processes that engage customers from the time they demonstrate interest in the ITA’s IT services through service termination.
- c. **Designee.** Designate the Customer Success Director to act on behalf of the ITA CIO to oversee IT strategic management across the ITA.
- d. **Policy.** Click [HERE](#) to see the Information Technology Customer Relations Oversight Policy statement.

**L. Information Technology Security Oversight**

- 1. The ITA CIO and DCIO will implement a(n):
  - a. **Information Security.** Designate an ITA Chief Information Security Officer (CISO) to serve as: a) the principle security leader for the ITA to implement the requirements of Federal Information Security Management Act (FISMA), and b) the ITA CIO’s liaison to federal agencies for all matters relating to organization IT security. The CISO develops ITA policies and procedures for implementing information security technologies and best practices to ensure the confidentiality, integrity, and availability of ITA information assets. The CISO also performs critical reviews of how well proposed projects fit and agree with Agency information security policies and procedures.
  - b. **Designee.** Designate the IT Security Director to act on behalf of the ITA CIO to oversee IT security management across the ITA.
  - c. **Policy.** Click [HERE](#) to see the Information Technology Security Oversight Policy statement.

**M. Information Technology Accessibility Oversight**

- 1. The ITA CIO and DCIO will implement a(n):
  - a. **Section 508 Oversight Executive.** ITA must implement the Section 508 Program as defined in the DOC Accessibility and Section 508 guidelines (<http://osec.doc.gov/Accessibility/default.htm>).
  - b. **Strategic Plan for Improving Management of Section 508.** Implement procedures that can be used by people with a wide range of abilities and disabilities. Accessible technology is either directly accessible or it is compatible with standard assistive technology.



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- c. **Designee.** Designate the Technology Transformation and Data Services Director to act on behalf of the ITA CIO to oversee IT accessibility across the ITA.
- d. **Policy.** Click [HERE](#) to see the Information Technology Accessibility Oversight Policy statement.

**7. RELATED DOCUMENTS**

- A. André Mendes. (2018). ITA Technology Strategic Plan. Washington, DC
- B. Alie, S. S. (2015). Project Governance: #1 Critical Success Factor. Paper presented at PMI® Global Congress 2015—North America, Orlando, FL. Newton Square, PA: Project Management Institute
- C. Federal Information Security Management Act of 2002, 44 U.S.C. ch.35, subch. III & 3541 et seq., ch.1 & 101, ch.35, subch. 1 &3501 et seq. Effective Dec 17, 2002.
- D. Evans, Karen S. (20 March 2007). "Managing Security Risk by Using Common Security Configurations" (DOC).
- E. Scott, Tony, Federal CIO, OMB Memorandum, M-15-13, Policy to require secure connections across federal websites and web services, June 8, 2015.
- F. Federal Enterprise Architecture Framework, Version 2, January 29, 2013.
- G. CMMI for Development, Version 1.3, November 2010, Carnegie Mellon University Software Engineering Institute.
- H. The TOGAF® Standard, Version 9.2
- I. Enterprise Architecture Charter, International Trade Administration, Version 2.0, August 20, 2018
- J. Enterprise Architecture (EA) Strategy, ITA, Version 1.3, May 30, 2018
- K. EA Artifacts, Technology Services and Innovation, Version 1.0, July 10, 2018  
Program Management Framework (2019). Technology, Services and Innovation Internal Document.

**8. WAIVERS**

There are no waivers from this policy.

**9. ADDITIONAL INFORMATION**

For further information about this Policy, please contact the Policy and Strategic Planning Directorate.

**10. AUTHORITY**

- A. Federal Information Technology Reform Act (FITARA) of 2014. Part of The National Defense Act of 2014, Subtitle D

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- B. Clinger Cohen Act of 1996
- C. Government Paperwork Elimination Act of 1998
- D. Section 508 of the Rehabilitation Act of 1973
- E. Title 5, Code of Federal Regulations, Part 1320 – Controlling Paperwork Burdens on the Public, 1995
- F. OMB Memorandum M-15-14, Management and Oversight of Federal Information Technology
- G. OMB Circular A-11, Preparation, Submission, and Execution of the Budget
- H. OMB Circular A-130, Management of Federal Information Resources
- I. OMB Memorandum M-13-13, Open Data Policy- Managing Information as an Asset
- J. Revision to the Federal Acquisition Certification for Program and Project Managers (FAC-P/PM)

**11. MATERIAL SUPERSEDED**

N/A

**André Mendes**  
**Chief Information Officer**  
**Technology, Services and Innovation**  
**International Trade Administration**