

**Subject: IT POLICY MANAGEMENT**

**1. PURPOSE** This Order establishes that the Department of Transportation (DOT or Department) Chief Information Officer (CIO) is the authoritative source of Department-wide policy and associated implementation instruction for the management and execution of all DOT information technology (IT) resources and systems. The Order assigns responsibilities for carrying out the development, maintenance, and issuance of Department-wide IT policy to the Associate CIO for IT Policy and Oversight.

**2. CANCELLATION** This Order supersedes DOT 1351.1 IT Directives Management Policy signed by the DOT Acting CIO on May 21, 2009.

**3. BACKGROUND**

- a. The Federal Information Technology Acquisitions Reform Act (FITARA)<sup>1</sup> establishes the Departmental CIO's role in "defin[ing] all the development processes, milestones, review gates, and the overall policies for capital planning, enterprise architecture, and project management and reporting for IT resources."<sup>2</sup> The Department has codified these authorities in the implementing regulations establishing the CIO as the "principal information technology, cyber security, privacy, and records management advisor to the Secretary, and the final authority on these matters within the Department."<sup>3</sup>
- b. The CIO establishes the framework, standards, and requirements for IT management through the Department-level policy and Component execution of CIO policy directives through implementation guidance. Effective IT management requires consistent application of policy, standards, guidance, and implementing instructions, across all Operating Administrations and Secretarial Offices, collectively referred to as "Components." IT policy issued by the DOT CIO provides a unified framework for the effective, efficient and secure use of IT resources and systems across the Department. Variance among DOT CIO and Component IT policy creates unnecessary inconsistency and duplication, resulting in inefficiencies and risk.
- c. The Department's IT policy is grounded in statute and federal guidance and standards and is sufficiently flexible to support the evolving IT ecosystem. Additionally, the Department's IT policy supports the development of implementation instructions, including standard operating procedures (SOP) by Components that augment the Department-wide policy with specific directions and processes. Component implementation instructions should not duplicate or conflict with Department-level IT policy and are subject to DOT CIO review and approval.

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<sup>1</sup> Public Law 113-291.

<sup>2</sup> OMB Memorandum M-15-14, Management and Oversight of Federal Information Technology, June 10, 2015.

<sup>3</sup> 49 CFR 1.48 & 1.49, Delegations to the Office of the Chief Information Officer.

- d. The Office of the Chief Information Officer (OCIO) Policy Program (Policy Program) works with OCIO stakeholders, business and system owners to collect, evaluate and integrate internal and external standards into common policy for the Department. The result is IT policy that establishes clear, concise, readable requirements for the way IT resources may be used, monitored, maintained, updated and decommissioned. The Policy Program increases the accountability of DOT Components and personnel<sup>4</sup> by establishing standards for IT decisions and actions and assigning responsibility for those standards to specific offices within DOT.
- e. IT policy consolidates the requirements from legislation, national guidance, presidential memoranda and best practices into a foundational document that establishes the standards of compliance and execution and communicates the goals of an IT initiative or program. Policies are formal statements of principle that address each category of IT resources and underpin IT decision-making to regulate, direct and control DOT IT related activities. IT policy is vital to the mission of the Department as it leverages IT to ensure a safe, secure, efficient, accessible and convenient transportation system.

#### 4. REFERENCES

- a. Public Law 113-291, Federal Information Technology Acquisition Reform Act (FITARA), December 19, 2014.
- b. OMB Memorandum M-15-14, Management and Oversight of Federal Information Technology, June 10, 2015.
- c. OMB Circular - A-130, "Managing Information as a Strategic Resource, June 28, 2016.
- d. 49 CFR 1.48 & 1.49, Delegations to the Office of Chief Information Officer, April 26, 2017

#### 5. DEFINITIONS

- a. *Implementation Instructions* - Implementation instructions include any supplemental information, provided by the DOT CIO that detail how responsible DOT Components or personnel will put policy requirements into practice. Implementation instructions establish operational activities, assign responsibilities, and outline the process steps required to support the implementation of policy requirements; these include but are not limited to, templates, standards, technical bulletins, notices, and standard operating procedure. Implementation instructions may be issued directly by the DOT CIO.<sup>5</sup>

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<sup>4</sup> Throughout this document, the term "personnel" is used to refer to all paid and unpaid members of the DOT staff, and DOT contractors and subcontractors.

<sup>5</sup> For ease of reading, unless explicitly stated this document will use "IT Policy" to refer to both policy and implementation instruction.

## 6. POLICY

- a. OCIO is the single authoritative source for all IT policy within DOT. Components are not authorized to establish or publish an IT policy without the express consent of the Departmental CIO as described in the Waiver section of this Order.<sup>6</sup>
- b. IT policy will be developed with a focus on maximizing flexibility while maintaining alignment with statute, OMB Guidance, and DOT Policy.
- c. DOT will publish all policies and implementation guidance in an accessible format on internal and external DOT websites for access by DOT personnel and the public.
- d. IT policy may be supplemented with additional implementation instruction as necessary. All implementation instruction will directly align to a parent policy and will be consistent with the standards stated therein.
  - 1) Components may publish Component-specific implementation instructions in the absence of the same from the DOT CIO, subject to OCIO review and approval.

**7. RESPONSIBILITIES** This section defines the roles key to implementing the Departmental Policy Program across the DOT and policy-specific responsibilities associated with each role. Provided below is a summary listing of the roles and the levels in the organization where they reside. The Departmental Chief Privacy and Information Asset Officer is designated the primary operational officer.

### **Department Level**

- a. Accountability for directing DOT's information and data integrity, and for all IT functions, resides with the DOT CIO. In addition to responsibilities listed elsewhere in Departmental policy, the **DOT CIO** will:
  - 1) Approve all IT policy issued by the Department;
  - 2) Ensure that all IT policy is integrated with DOT strategic and operational planning processes;
  - 3) Ensure the Policy Program is developed, documented, implemented and promoted throughout the Department to support policy management activities for all information systems, networks and data that support Departmental operations; and
  - 4) Ensure that the Policy Program is appropriately staffed and resourced.
- b. Operationalization of the Departmental Policy Program is assigned to the Associate CIO for IT Policy and Oversight (Associate CIO). The responsibilities of the Associate CIO may be delegated as appropriate. The **Associate CIO** will:
  - 1) Assume all operational oversight and strategic direction responsibilities for the Policy Program;

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<sup>6</sup> All statements contained in this Order are applicable to all Components but only to the extent that such requirements and recommendations are consistent with the expressed language contained in 49 U.S.C. 106 and 40110. The Federal Aviation Administration and Office of Inspector General will issue internal policies consistent with this policy and work with the DOT Chief Information Officer unless specifically prohibited by law.

- 2) Ensure that IT policy supports efficient, effective, and legally supportable decisions and operations concerning the acquisition, use, maintenance, updates and retirement of IT resources;
  - 3) Rationalize Component policies into IT policy updates and elevate Component practices to implementation instructions where appropriate; and
  - 4) Designate an appropriate OCIO official as the Policy Owner for each IT policy published by the DOT CIO. The Policy Owner is the accountable official for all IT policy including Component issued implementation instructions in the assigned domain.
- c. The **Office of the Senior Procurement Executive (OSPE)** under the delegated authority of the Assistant Secretary for Administration, will:
- 1) In carrying out the responsibilities of agency head for departmental procurement and functions of the Chief Acquisition Officer, partner with the DOT CIO to develop and implement DOT-specific policy-related solicitation provisions and contract clauses for incorporation in all current and future solicitations and contracts (and covered grants), and promote their use; and
  - 2) Partner with the DOT OCIO to develop internal procedural guidance and policies for solicitations and contracts (and associated acquisition-related documents) containing IT and ensure awareness and adherence to these policies by DOT contracting officers (COs).

#### **Component Level**

- d. Accountability for directing the information and data integrity of the Component and its groups, and for all IT functions, resides with the Component Chief IT Director, or equivalent (Component IT Director). In addition to responsibilities listed elsewhere in Departmental policy, the **Component IT Director** will:
- 1) Develop Component specific implementation in the absence of the same from the DOT CIO. Component implementation instruction must be approved by the OCIO Policy Owner for the parent IT policy prior to issuance; and
  - 2) Ensure that Component programs, systems, processes, and activities comply with IT policy.
- e. The **Chief of Contracting Office** will;
- 1) Collaborate with the Component IT Director to ensure contracts incorporate appropriate IT policy.

#### **DOT-Wide**

- f. All **DOT Personnel** will:
- 1) Review all policies prior to initiating new IT activities; updating existing systems or processes; or discontinuing any activity, system or process.
  - 2) Apply and uphold applicable policy requirements, roles or responsibilities laid out in policy or associated implementation guidance.

**8. DATES**

- a. The effective date of this Order is the date that it is signed.
- b. This Order will be audited and validated annually by the Associate CIO. The content of this Order will be reviewed to ensure that it has clear intent and contains current and accurate information.

**9. COMPLIANCE** Component IT policy published prior to the issuance of this Order shall be submitted to the DOT CIO for evaluation and incorporation into DOT IT policy as required by the DOT CIO. The issuance of this Order shall cancel any Component IT policy not explicitly authorized by the DOT CIO.

**10. WAIVERS**

- a. Compliance with this Order is mandatory.
- b. DOT Components may request that the DOT CIO grant a waiver of compliance upon request based on a compelling business reason. In addition to an explanation of the waiver sought, the waiver request must include: (1) the proposed justification for the waiver; (2) a description of what measures have been implemented to ensure that policy principles have been implemented; (3) the proposed waiver period; and (4) proposed milestones to achieve compliance. The DOT CIO will provide a written waiver or justification for denial.

**11. AUDIT PROCEDURES**

- a. To ensure the Department provides appropriate accountability for policy management, and that the Associate CIO responsible for IT policy provides active support and oversight of monitoring and improvement of the IT policy program, the Associate CIO will conduct an annual audit of the 1351.1A, IT Policy Management.



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