

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

## 1. Purpose

This standard is in effect from August 1, 2022 through December 31, 2022 to enable a pilot of delegated authority for procurement of certain low-risk software and IT services. This document specifies the process for procurement and the requirements for the procurement to be considered “low risk.”

## 2. Scope

For the pilot period, those 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 and Licensing Solutions (ITPALS) 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 ITPALS (<https://itpals.vt.edu/>) to procure any software and IT service that does not meet the 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 ITPALS is available via email to [lowrisksoftwarepilot-g@vt.edu](mailto:lowrisksoftwarepilot-g@vt.edu), but not required.
- The department must first register the planned procurement in ServiceNow, which can be done from the ITPALS website, <https://itpals.vt.edu/>. The Department Head must approve the plan to indicate that the procurement meets all requirements for low-risk procurement, agree to all terms and conditions for the software and IT service, and acknowledge that there will not be other reviews of the software, IT service or associated terms and conditions. Reports of software and IT services procured will be provided to ITPALS and to the IT Security Office (ITSO) 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.

### Requirements for a Low-Risk Procurement

A procurement is “low risk” if it meets all 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 medium risk data. High and medium 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 will not facilitate the collection 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: Note: 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: [procurement.vt.edu/itreseller](http://procurement.vt.edu/itreseller)

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 [lowrisksoftwarepilot-g@vt.edu](mailto:lowrisksoftwarepilot-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](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>

#### 5. Maintenance of Standard

The Office of the VPIT&CIO is responsible for this IT Standard. Questions may be directed to [vpit@vt.edu](mailto:vpit@vt.edu).

#### 6. Revisions

August 1, 2022 version 1 posted and effective.