Attachment 1

Countywide Legacy IT Standards
Exemption Policy (ITAM-0901)

SUBJECT:	LEGACY IT STANDARDS EXEMPTION		ITEM NUMBER:	ITAM-0901
OWNER:	GENERAL SERVICES		ADOPTION DATE:	MM/DD/20YY
APPROVER(S):	COUNTY BOARD OF SUPERVISORS		REVIEW DATE:	MM/DD/20YY
VERSION:	1.0		PAGE:	PAGE **1** OF **3**

I. Purpose

The purpose of this Management Memo is to declare that Information Technology solutions that are <u>in production</u> prior to September 10, 2020 are classified as "<u>legacy systems</u>". As such, they are not identified as technology standards and therefore not required to be approved by the Information Technology Standards Committee as stated in the Information Technology Administrative Manual (ITAM-0230).

The IT Standards Committee identified the need to allow for IT systems currently in production to not be disrupted by the new requirement that all technology standards require approval in order to operate on the County's IT network.

II. Audience

The audience for this policy is all County employees, contractors, and third parties who access County networks or systems.

III. Scope

This policy applies to anyone doing business as the County and/or in support of the County that is provisioned access to County Networks or systems. This includes employees, contractors, consultants, temporaries, and other workers at the County, including all personnel affiliated with third parties, collectively referred to hereafter as "agents".

IV. Definitions

a) Remediation Plan: A plan to perform the remediation of one or more threats or vulnerabilities facing an organization's systems. The plan typically includes options to remove threats and vulnerabilities and priorities for performing the remediation.
b) Legacy: Older systems or applications that may need to be secured to meet today's threats but often use older, less secure technology.
c) Out of Standard: Not meeting the explicit specifications for a method, format, item, component, system, or service that has been approved by the Standards Committee.
d) Owner Agency/Department: Agency or Department with managerial, operational, technical, and often budgetary responsibility for all aspects of an Information Technology System.
e) In Production: Technology Systems where functionality and availability must be ensured for the completion of day-to-day activities.

V. Policy

It is the policy of the County Board of Supervisors that:

The development of a new IT standard will include review of all legacy systems and an inventory of those impacted by the new standard. Those systems that are unable to

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immediately migrate to the new standard will be classified "out of standard" and managed through remediation plans that are reviewed annually until the legacy system is decommissioned.

Procedures or Actions Required

The IT Standards Committee will perform a review of the County's IT inventory and identify all "legacy systems". This will be tracked in the County's Application/System Inventory.

Development of new standards will include a review of all legacy systems and identification of those impacted by the new standard.

Proposals for new standards will include the list of systems impacted as well as an estimate of costs of migration to the new standard.

Legacy systems that are unable to be migrated as part of the initial implementation of the standard will be identified as "out of standard". Owners of "out of standard" systems will be required to develop a remediation plan that outlines adoption of the new standard or deprecation of the legacy system within three (3) budget cycles.

The IT Standards Committee will maintain an inventory of all County applications/systems that includes designation of "legacy" and "out of standard". This list will be shared with the CISO and Risk Management. Remediation plans will be filed with the Standards Committee and shared with EITC for review as requested but no less than annually.

Remediation plans for "out of standard" systems will be monitored by the CISO and Risk Management as part of the County's Risk Analysis and Risk Mitigation processes.

Exemption

If state or federal requirement mandates the continued use of a legacy system, these systems will likewise be identified as "out of standard". Remediation plans will be submitted; however, the timeframe for adoption within three (3) budget cycles is waived. If the continued operation of the "out of standard" system creates a security risk for the county, necessary measures will be identified and implemented in cooperation with the owner department(s).

Specialized systems for which there is no identified standard or that require the use of sub-systems that are not within standard (i.e. 4D vs SQL) will likewise be tracked via inventory and will require a remediation plan that identifies any particular risks related to the operation of that system with a mitigation plan to reduce those risks.

Annual Reports

Countywide Application/System inventory is to include designation of legacy systems and

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systems out of standard. Remediation plans will be made available for all out of standard systems. A breakdown of all systems, number legacy, number out of standard, and the number per future budget cycle that need to be addressed.

1) Applicable Rules, Laws, and Regulations:
   a) California Public Records Act (PRA)
   b) SB 272 Chapter 795 – Catalog of Enterprise Systems
   c) Health and Information Portability Accountability Act (HIPAA)
   d) Criminal Justice Information Services (CJIS)
   e) Personally Identifiable Information (PII)
   f) Payment Card Industry (PCI)

2) Exceptions: N/A

3) Non-Compliance:

The issue of non-compliance has been addressed through this policy and associated procedures by ensuring identification of impacted systems as part of the development of new standards; annual review of out of standard systems; requirement for a remediation plan to be produced by the owner agency with a plan for compliance within 3 budget cycles; continuous review of the plan by IT Standards Committee, CISO, Risk Management, and EITC. If an "out of standard" system is required due to some legitimate set of circumstances, EITC can direct a risk mitigation strategy to be put in place until compliance can be met.

4) Related Policies:
   a) Information Technology Administrative Manual (ITAM-0230)

5) Referenced Documents:

6) Revision History:

VERSION	CHANGE	AUTHOR	DATE OF CHANGE
1.0	Initial Release	Darrin Eisenbarth	08/25/2021