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Date: 8/22/2014 4:09:46 PM
Subject: RE: DIS Master Policy and Proviso 117.132 Update...

Agencies are to submit the proviso documents to the Division of Technology. The July 8th email, below, mentions "Information for submitting the IT plans referenced in the proviso will be forthcoming." It was conveyed on July 23rd, the format was being worked on by DTO.

What is the current status of the required information and format of the information for DTO?

If the specifics and format are not provided by September 8th, the information will be provide based upon this agency's interpretation of the proviso and in a format most convenient for this agency. If the specifics and format are received after the 8th, this agency will make an effort to provide the information based upon DTO's format by October 1st, but will not guarantee it.

Thank you,

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From: Information Security
Sent: Tuesday, July 08, 2014 1:17 PM
To: Information Security
Subject: DIS Master Policy and Proviso 117.132 Update...

With the General Assembly's passage of Proviso 117.132, the Division of Information Security (DIS) has provided a brief summary below to help clarify the differences between policy due dates and the proviso.

Master Policy - In this policy, DIS has established **June 30, 2014**, as the deadline for each agency to have **Roles and Responsibilities** assigned to perform policy work. **January 31, 2015**, is the deadline for each agency to document its **Plan of Action**, which would be comprised of its gap analyses and gap remediation plans. **July 1, 2016**, is the deadline for each agency to complete the execution of its Plan of Action, thereby achieving **full implementation of security controls**. We believe these deadlines enforce a timeline that weighs issues such as budget timing, staff resource constraints, and quality of delivered security, balanced against prudent speed.

To ensure compliance, an agency should document each of these phases using the tools published on the DIS website, on the "Resources" page, <http://dis.sc.gov/>. DIS requests that agencies with access to the Deloitte e-room submit each document as it is completed so that we can track progress. For all other agencies, DIS will provide instructions on how to submit these documents in the coming months.

Proviso 117.132 - This proviso requires agencies to submit comprehensive information technology (IT) plans to the Division of Technology by **October 1, 2014**. These comprehensive IT plans are independent of the policy DIS has posted. We made mention of the proviso in the policy training sessions because agencies may wish to include budgetary outputs from the Plan of Action (see above) in the IT plans required by the proviso. The proviso deadline and DIS policy deadlines are otherwise unrelated. The due date for the policy Plan of Action will remain **January 31, 2015**. Information for submitting the IT plans referenced in the proviso will be forthcoming.

For reference, the Master Policy and Proviso 117.132 are attached to this email. If you have remaining questions about any of these issues, please send them to informationsecurity@bcb.sc.gov.



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