Information Technology Vendor Management Guidelines

Submitted by Information Technology Acquisitions Policy Committee:
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Policy Document

Updated on 12/5/17

Sections:

Policy Statement

Information Technology Vendor Management Policy

All IT solutions, whether obtained through procurement, by gift, through research, donation, open source, or other, shall go through the IT Acquisition process before the new IT solution can be used. IT Services delivered by vendors will be reviewed on a periodic basis in order to ensure contractual obligations are met.

Purpose

In order to protect Clemson University's interests, property, and data. Clemson recognizes that acquiring new IT solutions is growing in complexity and rapidly changing. As a University, we have responsibilities and sometimes even liabilities to manage. Even the most basic acquisition of IT Solutions comes with a myriad of potential factors that must be considered, such as State procurement requirements, data governance, export control, compatibility, accessibility and support issues. Having a standard, centralized process for vetting the acquisition of new and continuing IT Solutions, whether through procurement, gift, research grant or otherwise, will help to ensure overall compatibility with current CU operating systems, reduce duplication and decrease unnecessary financial expenditures.

Responsible Department/Division (Contact Persons):

CCIT and CU Procurement will jointly administer and implement this policy by establishing and maintaining written guidelines to carry out the logistics of this policy. Contact persons for this policy are CCIT (Bobby Clark) and CU Procurement (Mike Nebesky).

Violation of Policy:

Violation of this policy may result in disciplinary action per the University Discipline Policy. Additionally, violation of this policy may result in:

- Loss of access to IT Solution.
- Report of unauthorized procurement per procurement policies.
- Accountable for immediate cure with costs charged back to the violator.

Approval Dates

12/18/17	Bobby Clark	Policy statement approval	1.0	Policy Statement was presented at the ELT meeting and was approved by that committee.

Revision History

Date	Authored by	Title	Ver.	Note
7/27/2016	IT Vendor Management Policy Committee	Policy and Framework Documents	0.1	No Change to main policy and purpose since 7/18/16 Update Procedural chart, Pre-test, Definitions, and KPI Guide.
11/16/16	IT Vendor Management Policy Committee	Updates to the Framework Document	0.2	Update Procedural chart, Pre-test, Definitions, and KPI Guide.
12/14/16	IT Vendor Management Policy Committee	Updates to the Policy Document	0.3	Consequences section reviewed to include Violation of Policy, update language with suggested text from HR. Update Guiding Principles, Pre-test, Definitions, Implementation Timeline..
2/22/17	Bobby Clark, Katherine Dobrenen, Carla Rathbone	Updates to the Policy and Procedure Documents	0.4	Change Published Locations Renamed Framework to Procedure Add Task Force to Roles and Responsibilities
11/5/17	Bobby Clark and Katherine Dobrenen	Updates to the Guiding Principles and Roles & Responsibilities per discussion with SW Asset Internal Audit	0.5	Add three changes to Guiding Principles. Add “Owner / User” to Roles and Responsibilities.
12/5/17	Bobby Clark	Change the Task Force to IT VMP Review Committee and Steering Committee to IT VMP Steering Committee. Update Implementation Schedule based on new Communication Plan	0.6	Changed after discussion with CIO Office on Committee structure.
12/21/17	Bobby Clark	Added Accessibility to the purpose of the Policy Statement. Added Accessible Accessibility Definition to Procedure document	1.01	After discussion with Accessibility coordinator, Dan Lewis, pending future decision accessibility policy.
1/31/18	Bobby Clark	Remove “Shepherd” and replace with Guide as request of Provost Council	1.02	“Shepherd” may have negative context change to a more descriptive term, “Guide”.

Published Locations

This policy will be published on the CCIT Website under the Policy section (http://ccit.clemson.edu/about/policy/) and the following sites will refer it:

- Procurement website (in multiple references on the website)
- Sponsored Programs website
- Development website

Information Technology Vendor Management Guidelines

Procedure Document:

The following information includes monitoring procedures, exemptions and guidelines maintained as a separate document from the policy document.

Sections:

- Guiding Principles
- Definitions
- Roles and Responsibilities
- Procedural Steps for Legal, Security, and other checkpoints
  - Assessment
  - Registration
  - Monitoring
- Implementation Timeline

Guiding Principles

- Users are required to use appropriate procurement methods to procure IT solutions. Those methods should promote better strategic decisions for Clemson.

- Initial and renewal acquisitions may take 90 days or more (depending on negotiations of contract terms and conditions). Please consider this timeline when planning your projects. In order to minimize lead time, take the following steps:

    - Include CCIT in the evaluation committee (SME[1]/advisor or voting member) for all RFPs for Information Technology Solutions
    - As soon as contract terms are known, engage legal, security, or export controls as appropriate.
    - Begin renewal process 90 days or more before expiration of existing contracts.
    - If divesting of the IT solution, check the contract to ensure CU has means of terminating the contract and make sure Clemson University can meet the notification requirements. Some contracts require notification of termination far in advance of the renewal date.
    - Older agreements that are more than three years ago may require a legal review depending on the type of agreement in question.
    - *All renewed software and services should be reviewed for performance based on the previous terms of contract and using the recommend KPI's, listed in this framework.*

- Gifts and Grants should be managed through the appropriate office (i.e. Advancement, Sponsored Programs). Supporting services and assistance should be taken in account before accepting gifts or receiving products or licenses.

- Users are encouraged to share information with the appropriate offices when purchasing IT solutions for any level – Individual, department, college, or Institution. *Clemson University's direction is to reallocate software licenses whenever appropriate and use licenses to the benefit of Clemson University, regardless of the license funding.*

- Software procurement must be acquired in the University requisition system (buyWays) when possible and always registered in CCIT/Purchasing approved application that records basic information on the IT Solution purchased. *All software and service purchased must be registered in the University's IT Solution Registry by the solutions owner or user within 30 days of acquisition*

- IT service agreements must be properly reviewed by the CU Legal and Procurement offices. Only the Chief Procurement Officer or Vice President level administrator can sign agreements on the behalf of the university.

- There will be standard Procedure required when soliciting any IT Product. The Procedure will consist of a set standard of questions and will be periodically reviewed and updated, as needed.

- Software Registration information will include details related to Licensing, and Vendor Management, Measurements. The accompanying Procedure will review Licenses information, key performance indicators (KPI), as well as Security concerns through various methods, which include user surveys, monitoring tools, and questionnaires.

- Contractual performance audits will be performed in tandem with security compliance audits triggered by the applicable data governance policies.

[1] SME- Subject Matter Expert

Definitions

The following are some definitions used in this proposed procedure.

Accessible / Accessibility - refers to the ability for intended users, regardless of disability or special needs, to access, use and benefit from an IT Solution. Accessible IT Solutions comply with accessibility standards, enabling users with disabilities to fully participate.

Acquisition - the act of obtaining goods or services. For purposes of this policy, we are breaking down acquisitions into three different types: Gifts & Donations, Grants, and Procurements.

Agreement - a legal agreement between Clemson University and vendor or supplier of a good or service. There are referred to Service Level Agreement (SLA) or End User Agreements (EULAs). This policy applies to external agreements for following types of acquisitions. Reviewing agreement must be done at Clemson Office of General Counsel headed the University General Counsel.

Cloud Services - A cloud service is any resource that is provided over the Internet. The most common cloud service resources are “Software as a Service” (SaaS), “Platform as a Service” (PaaS) and “Infrastructure as a Service” (IaaS). Cloud services can be private (locally hosted), public (vendor hosted), and hybrid (mixture of both private and public hosted services.)

Local Software - software which is installed “locally” on an individual workstation. Data use is governed by University’s Data Use Policy.

Private Cloud - Cloud services which are local hosted by Clemson University. I.e. VMware, services. Clemson treats this service like local software.

Public Cloud - Cloud services which are hosted by external source or vendor (i.e. AWS, Buyways). This service is subject to additional legal and security checks for Data use.

Hybrid Cloud - a mixture of both private and public hosted services. Clemson treats this service, like a Public Cloud service.

“Export Controls” typically refers to regulations administered by several federal agencies, especially the Departments of State, Commerce, and Treasury, that implement federal laws put in place to protect national security and, promote foreign policy.

FERPA (Family Educational Rights and Privacy Act of 1974) is federal legislation in the United States that protects the privacy of students' personally identifiable information (PII). The act applies to all educational institutions that receive federal funds.

Gift or Donation- an item given to someone without the expectation of payment. Clemson’s protocol for receiving gifts is defined by the Clemson Advancement Office.

Grant - non-repayable funds or products disbursed by one party (grantmakers), often a government department, corporation, foundation or trust, to a recipient, often (but not always) a nonprofit entity, educational institution, business or an individual. In order to receive a grant, some form of "Grant Writing" often referred to as either a proposal or an application is required. Clemson’s protocol for accepting grants is defined by the Clemson Office of Sponsored Program under the VP of Research.

HIPAA - Acronym that stands for the **Health Insurance Portability and Accountability Act**, a US law designed to provide privacy standards to protect patients' medical records and other health information provided to health plans, doctors, hospitals and other healthcare providers.

Infrastructure as a Service (**IaaS**) is a form of cloud computing that provides virtualized computing resources over the Internet. **IaaS** is one of three main categories of cloud computing services, alongside Software as a Service (SaaS) and Platform as a Service (PaaS).

IT Solution - A general term for any IT-related acquisition, whether it be software, hardware or service product.

IT Support Services - Services needed to support information technology at the University, including information technology acquired via gifts, grants, or procurements at the University. Services could include but are not limited to software deployment, user services, infrastructure and system administration, network engineering, telecommunication services, application development, hosting, and security services. These service are provided or evaluated by Clemson Computing and Information Technology (CCIT).**Personally identifiable information (PII)** is any data that could potentially identify a specific individual. Any information that can be used to distinguish one person from another and can be used for de-anonymizing anonymous data can be considered PII.

Platform as a service (**PaaS**) is a category of cloud computing services that provides a platform allowing customers to develop, run, and manage applications without the complexity of building and maintaining the infrastructure typically associated with developing and launching an app.

Procurement - the act of obtaining goods or services, as governed by SC Procurement Code. This code is administered at the University by the Chief Procurement Officer.

Signature Authority - The right to sign for the University and agree to binding terms in written agreements. University is limited to what kinds of agreements it can signed. The Chief Procurement Officer signed all procurement agreements. Other agreements must be signed at the Vice President / Dean Level.

Software as a Service (**SaaS**; pronounced /sæs/) is a software licensing and delivery model in which software is licensed on a subscription basis and is centrally hosted. It is sometimes referred to as "on-demand software". **SaaS** is typically accessed by users using a thin client via a web browser.

Stakeholder - A person, group or organization that has interest or concern in the proposed acquisition.

IT Solution Types

Types of IT Solutions for Acquisitions (i.e. Procurements, Gifts, Grants, and Open Source offerings) and key considerations:

Hardware-(HW)

- Must be tangible & physical.
- HW renewals must be re-bid.
- Data use/collection may need to be reviewed (video, weather, etc.).
- Depreciation needs to be accounted.
- Hardware is replaced not renewed.
- No Check Listing, or Legal Review is needed for Hardware.
- There is an inventory process which more appropriate for Hardware then a registration process.

Software-(SW, Private Cloud)

- Single License use on a computer or an user.
- Data is stored locally or Clemson University hosted.
- Renewals from RFP/bid must refer to the original order.
- No Data Use Check on software because Data Governance Policy governs use after acquisition.
- Examples: Windows, Office, Adobe Creative Cloud, MatLab, and others

Services (Public & Hybrid Cloud)

- Hardware & Software Maintenance is considered a service.
- Vendor Hosted:
    - Differs from Software: the data use applies since data not contained on a single computer or Clemson University hosted.
- Hosted / Cloud based solutions (SaaS/ IaaS, PaaS)
- Consulting (Specific Knowledge for a solution)
- Examples: Office365, Box, EduRoam, Buyways, and others.

Roles and Responsibilities

- **Owner / User** - initiate and follow through the chart below
    - Complete Pre-test for results to be used throughout the acquisition process
        - Address concerns indicated in the Pre-test
    - Signature authority at VP-level or designee for non-procurement acquisitions
        - Don’t sign legal agreements over $2,500
    - Register all software and services 30 days after acquisition.
    - Initiate regular performance reviews of any renewed products using recommended KPI

- **IT VMP Review Committee** - direct the vetting process for acquisitions; trigger annual review of contractual obligations; membership TBD (i.e. Guides). Chaired by CCIT CTO Office.
    - Responsible for reviewing Pre-test responses and directing users to take appropriate actions
    - Responsible for following up with users or others regarding appropriate actions until request for IT solution is released to acquisition (gift, procurement, etc)

- **Clemson Computing & Information Technology (CCIT)** review and approve technical solutions with appropriate exceptions noted.
    - User Support (Customer Relations, Distributed Support, Help Desk, Imaging & Deployment, etc)
    - Security - (data security measures and safeguards)
    - Infrastructure (Identity Management, Hosting, Development, compatibility and compliance.)
    - Other support departments (such Registrar, Facilities, Creative Services, etc.)

- **Export Control Officer** - engaged if the data will be outside the US.
- **Office of General Counsel** - Review and advise on agreements (risk, protection, compliance)
- **Office of Procurement Services** - Ensure rules/law followed, lead users through process
    - Liaison for user with the State Procurement Office
    - Signature authority or designee for procurement related contracts/agreements

- **Office of Sponsored Programs** / Pre-Award
    - Manage the award process to acquire technology related to grants
    - Grant acquisition is subject to the procurement code.

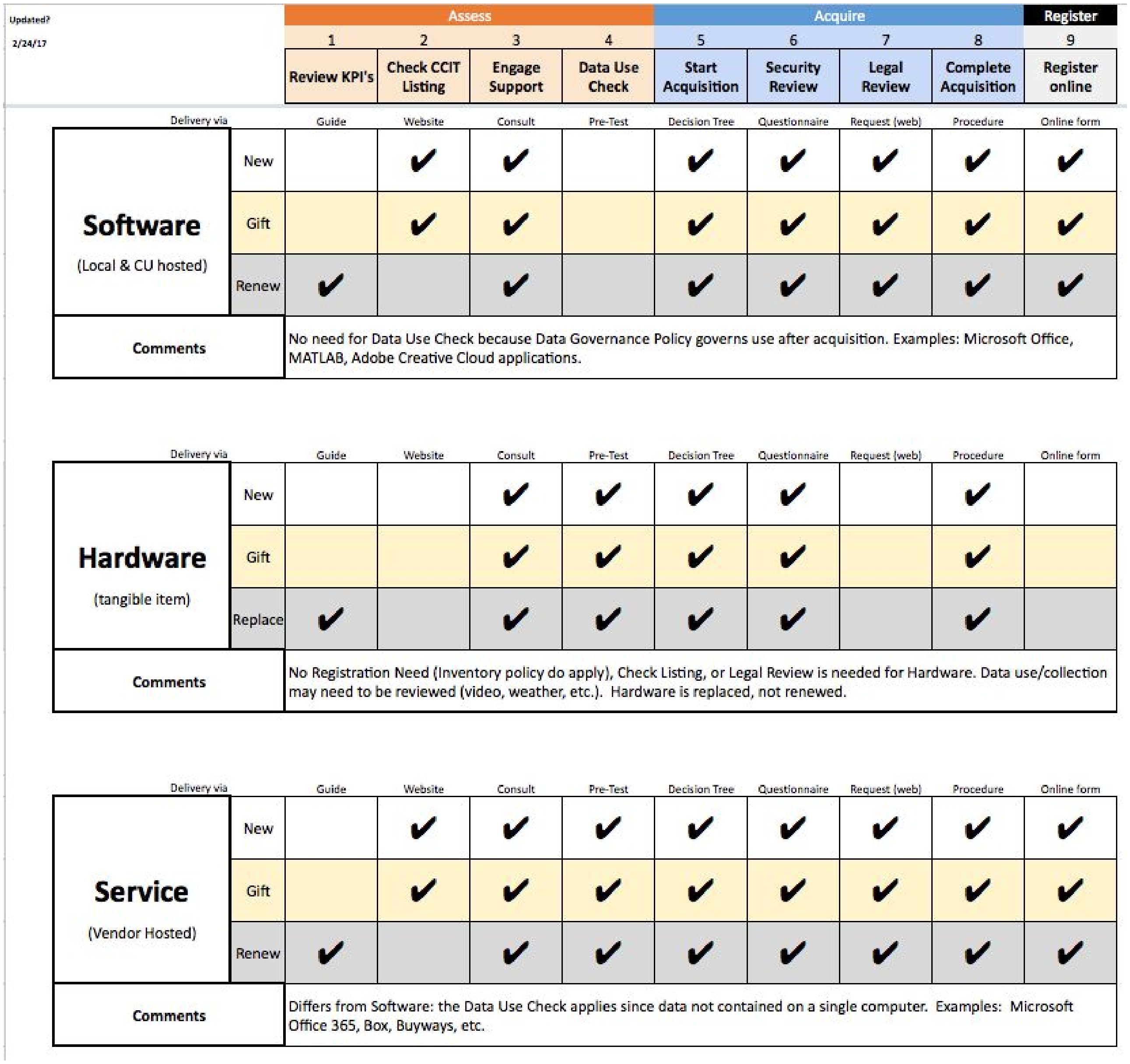
- **Office of Advancement**
    - Manage the process to acquire of any gifts and donations make to the University.

- **Data Stewards** own University datasets and control who has access, are a part of the **Data Governance Committee**, and issue MOUs specifying access and use of data.
- **IT VMP Steering Committee** -reviews policy and procedures annually and recommends changes

Procedural Steps for Legal, Security and other checkpoints

Assessment Overview

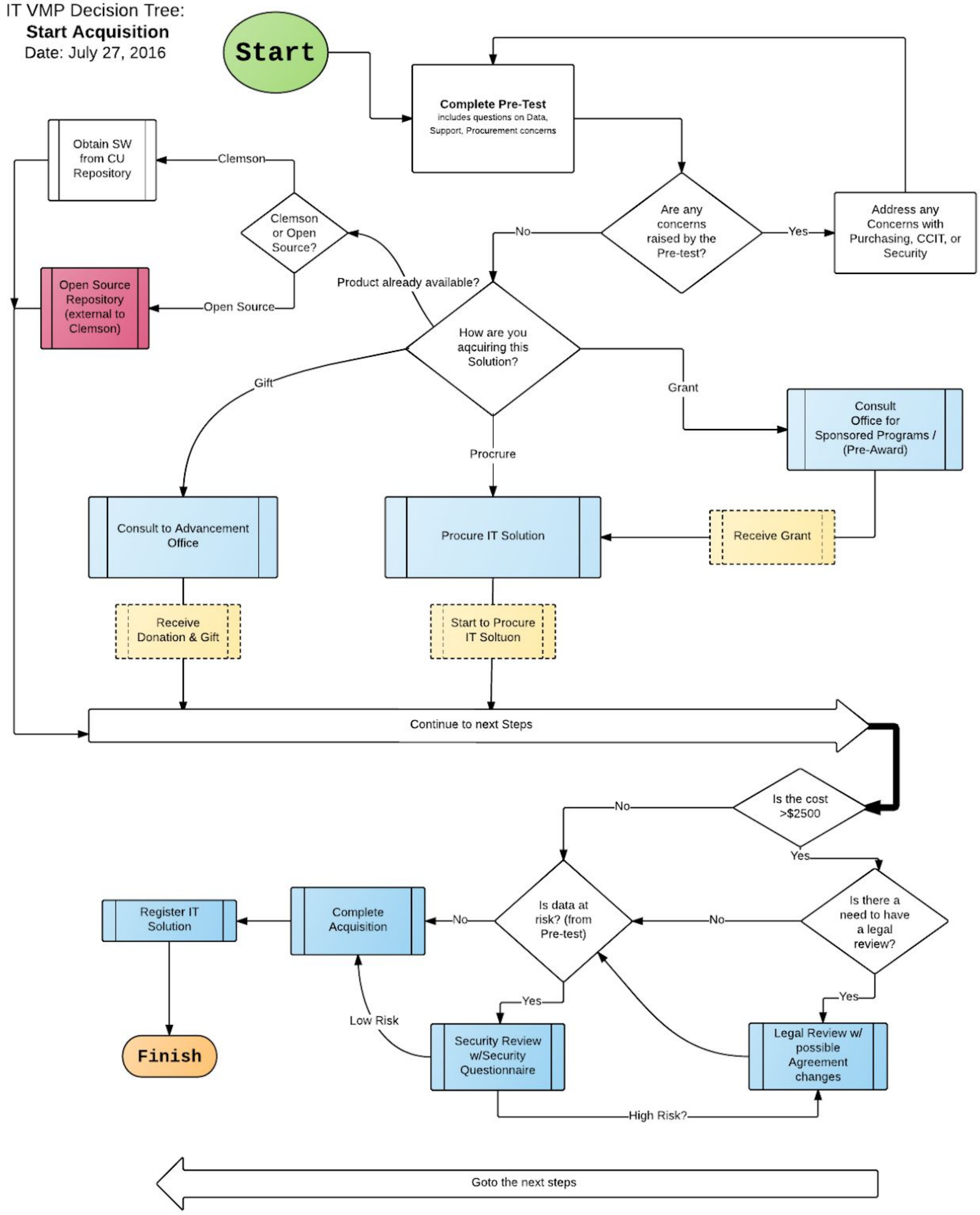
The following is a procedural chart listing the steps and functions in the acquisition process. The chart is divided into three phases: Assess, Acquire, and Register. All current IT software and service solutions need to be registered.



Updated? 2/24/17		Assess				Acquire				Register
		1	2	3	4	5	6	7	8	9
		Review KPI's	Check CCIT Listing	Engage Support	Data Use Check	Start Acquisition	Security Review	Legal Review	Complete Acquisition	Register online
Delivery via		Guide	Website	Consult	Pre-Test	Decision Tree	Questionnaire	Request (web)	Procedure	Online form
Software (Local & CU hosted)	New		✓	✓		✓	✓	✓	✓	✓
	Gift		✓	✓		✓	✓	✓	✓	✓
	Renew	✓		✓		✓	✓	✓	✓	✓
Comments		No need for Data Use Check because Data Governance Policy governs use after acquisition. Examples: Microsoft Office, MATLAB, Adobe Creative Cloud applications.								
Delivery via		Guide	Website	Consult	Pre-Test	Decision Tree	Questionnaire	Request (web)	Procedure	Online form
Hardware (tangible item)	New			✓	✓	✓	✓		✓	
	Gift			✓	✓	✓	✓		✓	
	Replace	✓		✓	✓	✓	✓		✓	
Comments		No Registration Need (Inventory policy do apply), Check Listing, or Legal Review is needed for Hardware. Data use/collection may need to be reviewed (video, weather, etc.). Hardware is replaced, not renewed.								
Delivery via		Guide	Website	Consult	Pre-Test	Decision Tree	Questionnaire	Request (web)	Procedure	Online form
Service (Vendor Hosted)	New		✓	✓	✓	✓	✓	✓	✓	✓
	Gift		✓	✓	✓	✓	✓	✓	✓	✓
	Renew	✓		✓	✓	✓	✓	✓	✓	✓
Comments		Differs from Software: the Data Use Check applies since data not contained on a single computer. Examples: Microsoft Office 365, Box, Buyways, etc.								

Procedural Chart for IT Vendor Management Policy

Decision Tree for Acquisitions


IT VMP Decision Tree:
Start Acquisition
Date: July 27, 2016
Start
Complete Pre-Test
includes questions on Data, Support, Procurement concerns
Are any concerns raised by the Pre-test?
Yes
Address any Concerns with Purchasing, CCIT, or Security
No
Product already available?
Clemson or Open Source?
Clemson
Obtain SW from CU Repository
Open Source
Open Source Repository (external to Clemson)
How are you aqcuiring this Solution?
Gift
Procrure
Grant
Consult Office for Sponsored Programs / (Pre-Award)
Receive Grant
Consult to Advancement Office
Procure IT Solution
Receive Donation & Gift
Start to Procure IT Soltuon
Continue to next Steps
Is the cost >$2500
No
Yes
Is there a need to have a legal review?
No
Yes
Is data at risk? (from Pre-test)
No
Yes
Complete Acquisition
Register IT Solution
Finish
Low Risk
Security Review w/Security Questionnaire
Legal Review w/ possible Agreement changes
High Risk?
Goto the next steps

Assessment Pre-Test

The IT Vendor Management Task Force will create and maintain a pre-test for IT Solutions. This Pre-test will be used to create a profile of the IT solution under consideration.

Sample Google Form: https://docs.google.com/forms/u/1/d/1xQ2hxpn6eNgWEpQpY_sV49DnIEc0ZRQdyKEBITwS_hU/edit
Dry-Run Listings (as of 10/15/16) https://docs.google.com/spreadsheets/d/1NEwtv_BXflWinvyywQrOQR-5Z_Y0qdTdeOlkERIoIU0/edit#gid=0
Pre-test Guidance Draft (as 9/19/16): https://docs.google.com/document/d/1IAZOHFVku-08Su5PqtgKULCLNeC1S-0-eLFFSkTeTjk/edit#

Solution Name: ____

Please a short name to the solution. (We will use this reference with describing it with other governance entity)

Qualifying Questions

If any of the answers to these initial questions is yes, then user must complete the Pre-Test questions and be vetted by the IT VM Task Force. (Note: Software and Service must be registered in IT Solutions Registry; Hardware acquisitions must be inventoried in the AIM or DAT system.)

- Is there a signature for a legal agreement required with the acquisition?
- Is there any university data involved?
- Is the value/cost of the acquisition over $2,500 dollars?

If all three questions are "No" then user proceeds with the flow above (bypassing pre-test questions).

Acquisitions Pre-Test

1. **What are you acquiring? Is it software, hardware or service?**
    a. If considering software or service, is anything being downloaded or running on a University computer? If hosting is needed, then you need to engage CCIT (ISO)
    b. Is this a new purchase or a renewal? Hardware maintenance renewals must be re-bid.
    c. What are you attempting to do or gain by acquiring this product?

2. **Does Clemson already have a license for this product?**
    a. If yes, does available license give you same capabilities as the one you wish to acquire?

b. If this is a software renewal, hardware replacement or existing service, please review recommended KPIs for the product.

3. **How is the acquisition being paid for or is it a “gift” or at no cost to the University?**

   a. Do you have a copy of a license or service agreement?
   b. Does Clemson have an executed contract in place for this product?
   c. Is the acquisition part of a Research Grant?

4. **What Clemson data will be used by this software or service?**

   a. Is there FERPA, HIPAA, Export Controlled, or PII data used/accessed in solution?
      i. If yes, then requires a legal review. Once the agreement is in hand, engage OGC through intake form (procurement/ccit)
   b. If you are not sure, how will Clemson use this software or service?
      i. CCIT, Procurement, can assist in determining appropriate governance.
   c. If software or services are being hosted, in what location will the data reside (in or out the US.)?
      i. If outside the US, engage Export Control Officer.
   d. Will you require data that resides in another existing CU system?
      i. If data is required from another system, obtain a data governance MOU from the appropriate data steward. (how?)

5. **How is this acquisition to be supported? (i.e. deployment, maintenance, infrastructure)**

   a. What is the vendor providing?
      i. For an existing contract, is the vendor providing adequate support?
   b. Do you need additional assistance with the product/service?

Registration

The following guidelines apply to all purchases except hardware purchases (it does apply to Hardware Maintenance acquisitions under services).

Guiding Principles

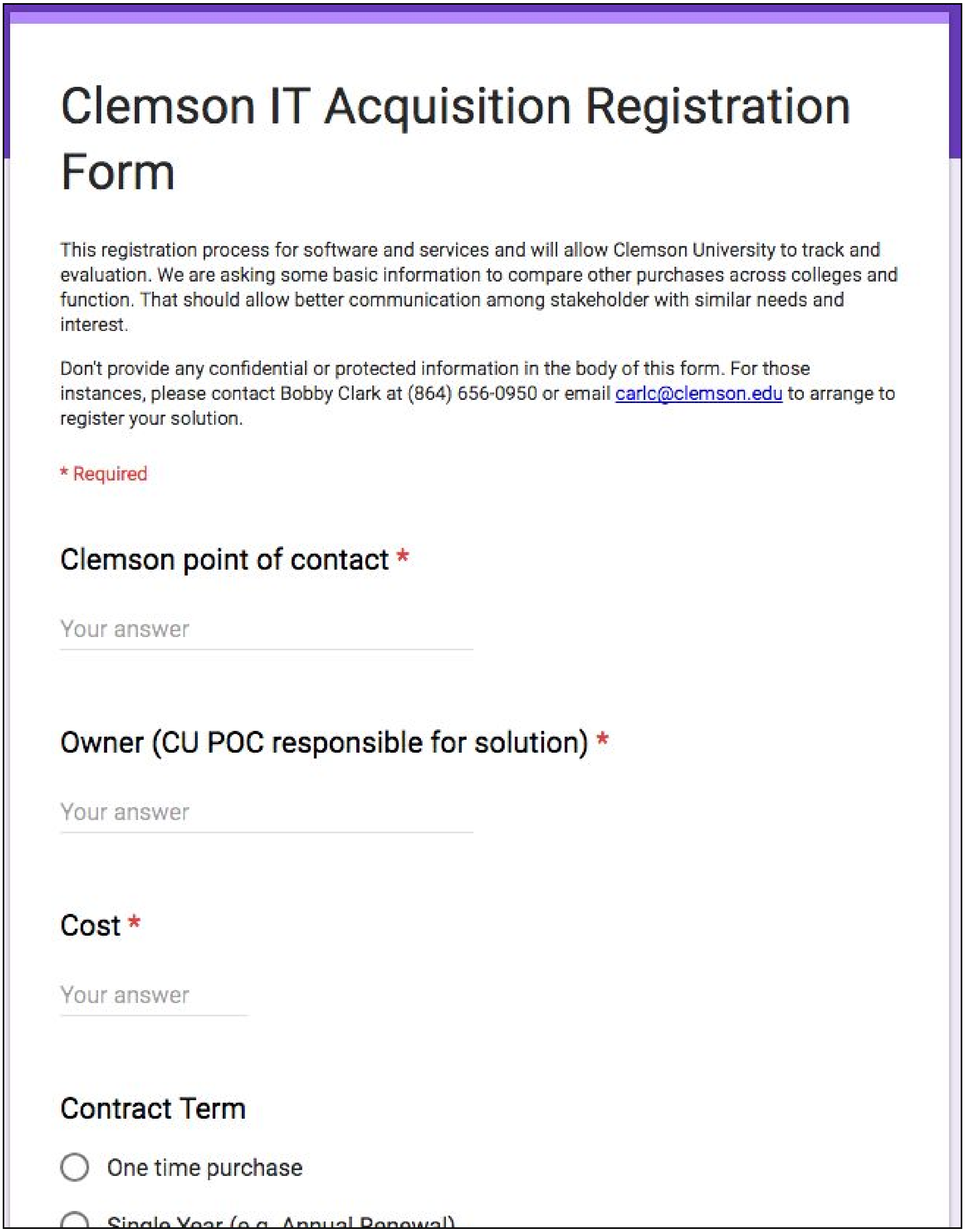
- Follow procurement rules always.
- Be as concise as possible
- CFO is only signature authority for purchases / VP Level w/o a Purchase
- Purchases should be deferred to buyways when possible.
- Encourage buyways, but all software or services must register.
- This data is strategically important in order to see trends and act proactively.

Required information

1. Clemson point of contact (POC)
2. Description
3. Renewal timeframe (Annual, Multiple Years, Start & End Dates)
4. Cost
5. Owner
6. Reference to purchase (ie P-CARD, PO#, Requisition#, skips Vendor Management data)
7. Support needed
8. Signed Agreement?
9. **Vendor Contact Information**
    a. Vendor / Supplier
    b. Vendor POC
    c. Vendor Email
    d. Vendor Phone
    e. Vendor Comments

Sample Registration Form - (using google form)

https://docs.google.com/a/g.clemson.edu/forms/d/15psubEdgHVrBf8TFs88iTqSWK4X-1oPtCMbdP1ePaww/edit?usp=sharing



Clemson IT Acquisition Registration Form

This registration process for software and services and will allow Clemson University to track and evaluation. We are asking some basic information to compare other purchases across colleges and function. That should allow better communication among stakeholder with similar needs and interest.

Don't provide any confidential or protected information in the body of this form. For those instances, please contact Bobby Clark at (864) 656-0950 or email carlc@clemson.edu to arrange to register your solution.

* Required

Clemson point of contact *

Your answer

Owner (CU POC responsible for solution) *

Your answer

Cost *

Your answer

Contract Term

○ One time purchase

○ Single Year (e.g. Annual Renewal)

Monitoring Existing IT Solutions

All IT solutions should be evaluated periodically with the following Key Performance Indicators (KPI's). This evaluation should allow the stakeholders to make a measured decision if the solution should continue to be use on campus.

1. Hardware
    a. Delivery ontime
    b. Warranty (failure rate, replacement & turnaround time)
    c. Performed as specified

2. Software (Local or CU Hosted)
    a. Ask data use or security questions, (see Acquisition Pre-test)
    b. Functions as specified
    c. Patches /Fixes delivered timely
    d. Software Maintenance Upgrades (new functionality) available timely

3. Service (includes SaaS, PaaS, IaaS)
    a. Same as Software
    PLUS
    b. Ask Export Controls questions
    c. Availability as specified (recommend at least 99.9% uptime)

4. New Terms - Legal / Procurement
    a. Triggers a Procurement review / possibly require a CU Legal review

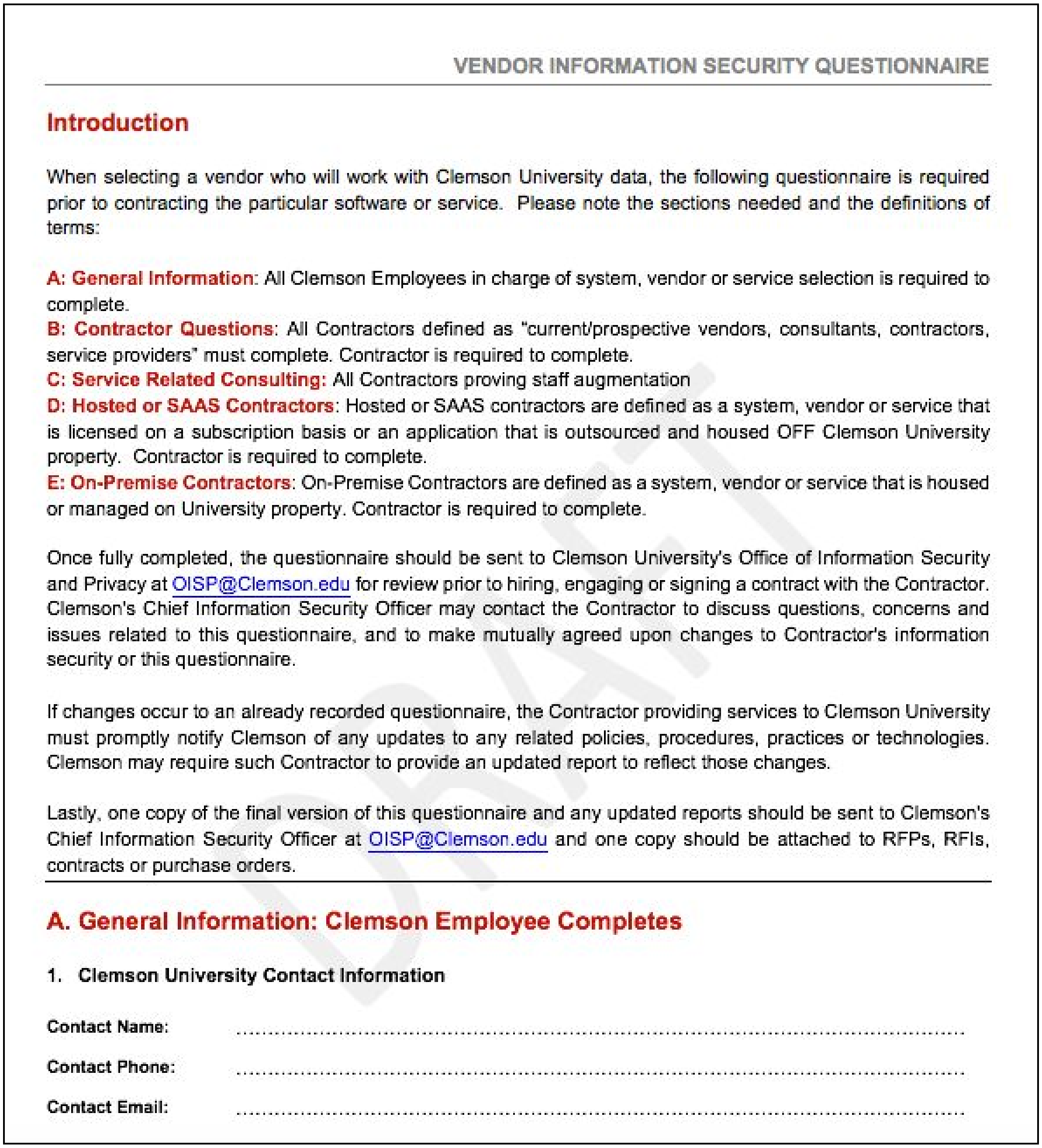
5. Change in Export Terms
    a. Triggers an Export Controls review

6. Change in Data Use
    a. Triggers a Data Governance Committee review

7. Change in Security Terms
    a. Triggers a security review

Security Concerns

Chief Information Security Office submitted a security questionnaire for use as security review. Several institutions are already using this questionnaire for their IT products. The Acquisition Pre-test will be used a trigger to determine whether the need for a full security review using this questionnaire.



VENDOR INFORMATION SECURITY QUESTIONNAIRE

Introduction

When selecting a vendor who will work with Clemson University data, the following questionnaire is required prior to contracting the particular software or service. Please note the sections needed and the definitions of terms:

A: General Information: All Clemson Employees in charge of system, vendor or service selection is required to complete.
B: Contractor Questions: All Contractors defined as "current/prospective vendors, consultants, contractors, service providers" must complete. Contractor is required to complete.
C: Service Related Consulting: All Contractors proving staff augmentation
D: Hosted or SAAS Contractors: Hosted or SAAS contractors are defined as a system, vendor or service that is licensed on a subscription basis or an application that is outsourced and housed OFF Clemson University property. Contractor is required to complete.
E: On-Premise Contractors: On-Premise Contractors are defined as a system, vendor or service that is housed or managed on University property. Contractor is required to complete.

Once fully completed, the questionnaire should be sent to Clemson University's Office of Information Security and Privacy at OISP@Clemson.edu for review prior to hiring, engaging or signing a contract with the Contractor. Clemson's Chief Information Security Officer may contact the Contractor to discuss questions, concerns and issues related to this questionnaire, and to make mutually agreed upon changes to Contractor's information security or this questionnaire.

If changes occur to an already recorded questionnaire, the Contractor providing services to Clemson University must promptly notify Clemson of any updates to any related policies, procedures, practices or technologies. Clemson may require such Contractor to provide an updated report to reflect those changes.

Lastly, one copy of the final version of this questionnaire and any updated reports should be sent to Clemson's Chief Information Security Officer at OISP@Clemson.edu and one copy should be attached to RFPs, RFIs, contracts or purchase orders.

A. General Information: Clemson Employee Completes

1. Clemson University Contact Information

Contact Name: ....

Contact Phone: ....

Contact Email: ....

Implementation Timeline

Section	**Implementation Date**
1.1 Planning & Development	December 2015 to October 2016
1.2 Approval Submission	July 2016
1.2.1. Received Approval	DGC - October 2016 OGC - October 2016 ELT - December 2017
1.3 Implementation	January 1, 2018 - June 31 2018
1.4 Policy effective	July 1, 2018