

From: Holloway, Karen [Karen_Holloway@sra.com]

Sent: Wednesday, May 05, 2004 3:01 PM

To: 'EFAST2@DOL.GOV'

Subject: Attn: EFAST RFC

SRA, International appreciates the opportunity to comment on the possible design enhancements for the EFAST2 modernization program currently under consideration by the Department of Labor, Internal Revenue Service, Pension Benefit Guaranty Corporation, and the Social Security Administration.

Please see our attached response.

Karen Holloway
Principal, SRA International
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Response to Department of Labor, EFAST2 Modernization Program Request for Comments (RFC)

SRA International

May 5, 2004

SRA appreciates the opportunity to comment on the possible design enhancements for the EFAST program currently under consideration by the Department of Labor, Internal Revenue Service, Pension Benefit Guaranty Corporation, and the Social Security Administration.

About SRA, International

SRA is a leading provider of information technology services and solutions to clients in the national security, civil government, and health care industries. Headquartered in Fairfax, Virginia with offices throughout the U.S., we have been more than 3,200 talented professionals providing strategic consulting; systems design, development and integration; and outsourcing and operations management. SRA International (SRA) understands the challenges that Government agencies face with developing and implementing effective e-Government Solutions for the benefit of citizens and businesses alike. We have a proven ability to use our IT consulting expertise in business re-engineering, strategy development, web-based systems design and development, and systems integration to achieve results-oriented solutions. For more information about our company, please visit our web site at www.sra.com.

Through our e-Government solutions offering, SRA understands the challenges that the Department of Labor, Employee Benefits Security Administration (EBSA) is facing with its modernization program for EFAST. Over the course of the last year, SRA provided strategic IT and business consulting services to the Pension Benefit Guaranty Corporation (PBGC) regarding its vision for an online e-filing system. Through this partnership, SRA designed and developed a web-based e-filing system and practitioner self-service center for the PBGC that was released to the public on February 18, 2004. This new online e-filing system is called "My Plan Administration Account" (My PAA). For more information regarding this new system, visit PBGC's website at www.pbgc.gov/plan_admin/myPAA_intro.htm. Based upon our experience with PBGC and the development of the My PAA system, we believe our company and the expertise of our IT professionals can provide considerable value to EBSA and the EFAST2 modernization program. Given the striking similarities between PBGC's premium filing requirements and the EFAST program with respect to the external business constituency and the data collected, EBSA could easily leverage our expertise and solutions.

Comments on the proposed design enhancements for EFAST

In light of our experience with the development of PBGC's practitioner e-filing system, we respectfully submit the following comments:

1. We recommend that the EFAST program consider an initial business process re-engineering phase that will assist with refining the proposed concept of operations model for EFAST filing. During our engagement with PBGC, we found that our client achieved extraordinary benefits from a strategic business strategy, visioning, and business process engineering phase prior to system development. The intersection between business

strategy and technological capabilities often yields high returns that produces creative and effective solutions to business objectives.

2. We also recommend that the EFAST program consider usability testing intervals as a part of its modernization effort. In working with PBGC on the practitioner e-filing system, we conducted a usability test of an initial beta release. This phase of the project was instrumental in testing major assumptions and refining requirements. PBGC was visionary in its approach to incorporate such testing into its system development contract. We would advocate that the EFAST program incorporate multiple iterations of usability test cycles with various practitioner groups as well as a frequent mechanism for soliciting feedback from external users on interface designs, system behavior, and human factors engineering principles. In our experience, developing a system for external audiences with which contact and feedback is too infrequent, could jeopardize the project's ability to obtain its business objectives for high utilization by end users.
3. Regarding security and authentication, we recommend that the modernization effort include a risk assessment as a part of the development of the proposed new authentication model. We assisted PBGC with this effort and refined the authentication model for their e-filing system accordingly. PBGC's authentication model encapsulates an entirely electronic process, which reduces practitioner burden and helps to promote the use of their e-filing system. We recommend the development of the authentication model details in concert with the development of the system's design process, specifically during the development of the detailed system data model for EFAST2.
4. At this stage in the EFAST modernization program, we advise the Agencies to remain technology neutral. Prescribing technologies, platforms, or detailed requirements prior to conducting a business process re-engineering phase could result in a loss of available and creative solutions.
5. Our development of PBGC's e-filing system involves XML as a data exchange format and we agree that this format provides a robust, non-proprietary, persistent, and verifiable file format for the storage and transmission of text and data over the Web. We suggest; however, that the EFAST program consider XBRL as a part of the file format for the data distribution process for public disclosure and government access. However, depending upon the system architecture for e-filing transactional processing, an alternate XML specification for data transfer to the EFAST 2 system may be more appropriate.
6. Regarding third-party attachments and attestations, we recommend that the Agencies consider the possibility for allowing the submission of these statements and data as a part of an online filing, allowing the authors of such information to sign electronically as well. SRA has a method and technology that will allow signatures of multiple practitioners, while retaining data integrity and non-repudiation of the signature. We utilized this approach with PBGC's online e-filing system. These possibilities could be explored during a business process re-engineering phase for EFAST2.



7. During the development of PBGC's e-filing system, a major design issue involved the lack of a unique identifier for pension plans. Our team developed a solution which involves complex logic, however, operational issues persist. We strongly encourage the collaboration among the Agencies to enforce the generation and use of a unique Employer Identification Number (EIN) as well as Plan Number (PN). Such an arrangement will better serve both the Agencies and the businesses in our opinion, while operational costs.

Contact Information

In the event that the Agencies or EBSA wish to contact us for further information regarding our comments or solution offerings regarding the EFAST modernization effort, the following individuals should be contacted. Our work on the PBGC practitioner e-filing solution was performed under the program management and technical direction of:

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