GSA FAS
Transition Summit
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TAKING TIME to TRANSFORM

FISMA

Perryn Ashmore
FAS Deputy CIO
Debbie Hren
Networx Operations Planning
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Background

- **TWG raised concerns that C&A on Networx could be costly and jeopardize timeliness of transition**
- **Major concerns**
  - **C&A of provider's backbone (the public network)**
  - **C&A of operational support systems (OSS) of providers**
  - **Getting decision in time for Agencies to plan**
- **Formed SWG to define issues and recommend solution for OMB's concurrence**

Issues and Status

- **Issue 1: Impact of transition on existing C&As**
  - SWG Conclusion: Agencies will determine the impact of transition on existing C&As
  - Issue Closed

- **Issue 2: Agency interim authority to operate (IATO) when transitioning services provided using public telecommunications network**
  - SWG Conclusion: OMB does not recognize IATO's
  - Issue Closed

Issues and Status

- **Issue 3: Ability of Government to C&A the public network**
    - **SWG Conclusion: OMB does not expect Government Agencies to C&A the public Network**
    - **Issue Closed**

- **Issue 4: Responsibilities of Agencies that provide contracting vehicles for telecommunications services, such as GSA**
    - **SWG Conclusion: GSA to identify the appropriate reviews, reports, and other information documenting contract compliance that Agencies need to assist them in certifying their networks**
    - **In progress (next slide)**

Compliance Solution

- **GSA develop a "crosswalk" of the security requirements on FTS2001 to Networx**
  - **Status: Completed. All FTS2001 requirements are in Networx**
  - **Networx requirements are much more robust**

- **GSA list security requirements for network service providers on government contracts**
  - **Status: Completed 5/22**

Compliance Solution

- **GSA list actions of administrators of network services contracts to monitor contractors' adherence to security requirements**
  - **Status: SWG comments received 9/1**
  - **Present to IMC for review and concurrence (see next slide)**

- **GSA and OMB develop security planning information and disseminate to Agencies in advance of Networx transition.**
  - **Status: Deleted 8/1 by SWG**
  - **Agencies accept responsibility to C&A their use of Networx services**

GSA Compliance Monitoring

- **FAS PMO ensures compliance with contractual requirements**
  - **Pre-award assessment of plans and test approach**
  - **Post-award verification of access controls on ordering and billing systems**
  - **Life-cycle monitoring of security plans, risk assessments, breaches**
  - **Enforce compliance with any required controls not implemented by contractor**

GSA Compliance Monitoring

- **FAS OCIO conducts C&A on GSA's billing system**

- **FAS OCIO tests full set of controls to first touch point of OSS, thereby conducting C&A of all OSS**
  - **Done at system risk = moderate impact**
  - **GSA provides report of risks to Agencies**
  - **If Agency decides risk is unacceptable, orders additional security controls and conducts its own certification, or chooses contractor with acceptable risks**

Networx OSS C&A Boundaries
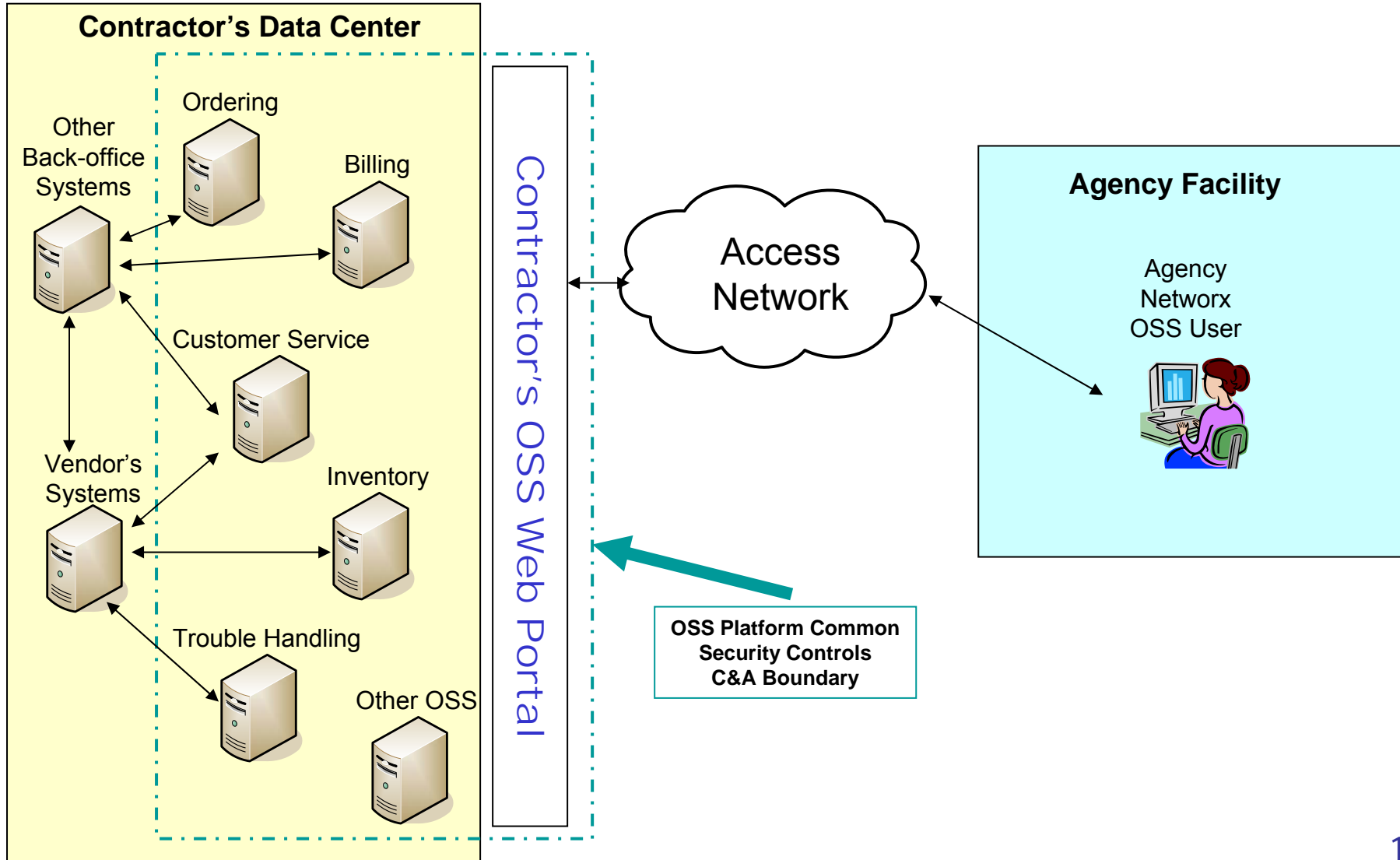
Schedule

Task Name	2007										
	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Universal Award		◆									
Universal Notice to Proceed		▬									
Enterprise Award				◆							
Enterprise Notice to Proceed					▬						
OSS Verification			▬▬▬▬▬▬▬								
C&A of OSS						▬▬▬▬▬▬▬▬					
Fair Opportunity Decisions					▬▬▬▬▬▬▬▬▬▬▬						