**ADVISORY MEMORANDUM REPORT
CONSOLIDATION OF SBA'S SYSTEMS
SUBJECT TO FISMA**

AUDIT REPORT NUMBER 5-19

MAY 20, 2005

U.S. SMALL BUSINESS ADMINISTRATION
OFFICE OF INSPECTOR GENERAL
WASHINGTON, D.C. 20416

ADVISORY MEMORANDUM REPORT
Issue Date: May 20, 2005
Number: 5-19

To: Jerry E. Williams
               Acting Chief Information Officer

               /S/ Original Signed
From: Robert G. Seabrooks
               Assistant Inspector General for Audit

Subject: Consolidation of SBA's Systems Subject to the Federal Information
               Security Management Act

       We have completed a review of SBA's major Information Technology (IT) systems that are subject to the Federal Information Security Management Act (FISMA). Our overall objective was to determine if SBA could reduce its number of general support systems and major applications to its internally recommended five systems and still meet FISMA security requirements. We have concluded that SBA has 16 major applications and four general support systems which meet criteria established by the Office of Management and Budget (OMB) for FISMA reporting as major systems (See Appendix A for a list of systems we conclude meet the definition of a general support system or major application).

       SBA reviewed a draft of this report and generally concurred with the conclusions in the report. SBA suggested changing two subsystems from the draft report. Additionally, SBA suggested name changes to a number of its systems. SBA's full response is included as Attachment D to this report. All SBA suggested changes were incorporated into the final report.

BACKGROUND

       Since the inception of the Government Information Security Reform Act (GISRA) in FY 2001 (the precursor of FISMA), the Office of Inspector General (OIG) has worked with SBA management to correctly identify SBA's general support systems and major applications. In FY 2002, the OIG concluded that SBA could consolidate its major system list from 95 systems to 37 systems (OIG Report 2-28). Additionally, OIG has worked with SBA management to identify the correct number of systems which should

be subject to GISRA or FISMA requirements based upon OMB criteria. OIG has, in previous audits, recommended the addition of NFC Payroll (OIG Report 3-20) as a major application as well as the Sybase Servers (OIG Report 1-21) as a general support system.

Recently, SBA undertook a project to reduce its major systems subject to FISMA requirements. SBA's preliminary results identified five mission critical systems subject to both its Continuity of Operations Program (COOP) and FISMA. As a result, SBA was proposing the declassification of approximately 34 systems subject to FISMA. SBA decided on the five systems using criteria developed by the Department of Transportation (DOT) evaluation of its major systems subject to COOP. SBA requested OIG's concurrence on the proposed reduction of the current list of 39 major IT systems to five. Based upon this request, OIG conducted a review to determine an appropriate number of SBA systems subject to FISMA.

OBJECTIVES, SCOPE AND METHODOLOGY

The objective of this evaluation was to determine whether SBA could consolidate its major system list based upon criteria from OMB Memorandum 04-25 "FY 2004 Reporting Instructions for the Federal Information Security Management Act" and OMB Circular A-130 "Management of Federal Information Resources."

- OMB Circular A-130 Appendix III provides that adequate security is defined as security which is commensurate with the risk and magnitude of the harm resulting from the loss, misuse, or unauthorized access to or modification of information. This includes assuring that systems and applications used by the agency operate effectively and provide appropriate confidentiality, integrity, and availability, through the use of cost-effective management, personnel, operational, and technical controls.

- OMB Circular A-130 Appendix III describes an information system as a discrete set of information resources organized for the collection, processing, maintenance, transmission, and dissemination of information, in accordance with defined procedures, whether automated or manual. Additionally, a major system is an application that requires special attention to security due to the risk and magnitude of the harm resulting from the loss, misuse, or unauthorized access to or modification of the information in the application.

- OMB Memorandum 04-25 provides that all major IT investments (those above $500,000 which have Capital Asset Plans and Business Cases) would be considered as "major" systems for FISMA purposes.

We held interviews with SBA personnel, reviewed SBA system Certification and Accreditation documentation and evaluated this information using existing criteria for general support systems and major systems subject to FISMA. This evaluation occurred during March and April 2005.

EVALUATION RESULTS

SBA can achieve economies of scale in consolidating its existing 39 systems subject to FISMA reporting into 20 systems (Appendix A) without reducing the underlying security of SBA information within any of those systems. Additionally, SBA may be able to increase its security efforts in concentrating on the residual risks in the remaining 20 systems (SBA plans to retire one system in December 2005 ultimately reducing the number of major systems subject to FISMA to a total of 19). Currently, SBA expends approximately $25,000 to recertify existing major SBA systems every three years. SBA could potentially save approximately $158,333 every year or $475,000 every three years in not performing Certifications and Accreditations (C&A) on systems which are really subsystems and feeder systems or nonmajor IT systems. See Appendix A, for a breakdown of recommended consolidations of systems and recommended potentially new systems.

Finding 1:   Consolidate Nine Existing Loan, Lending and Servicing Application Systems into the Loan Accounting System

Nine current SBA systems can be consolidated into the current Loan Accounting System/Loan Accounting Daily Update Cycle (LAS/LADUC). These nine systems can be consolidated as they perform functions such as feeder systems, subsystems, or reporting functions within current SBA systems. If this consolidation is performed correctly, it can occur without any loss in meeting the underlying Federal security requirements for the systems.

The following nine SBA systems are identified for consolidation in to a Consolidated LAS/LADUC (See Appendix B):

- Credit Bureau Reporting – Reports on delinquent or charged-off SBA loans to credit bureau agencies.
- Delinquent Loan Collection System – Tracks delinquent SBA loan payments.
- Field Cashiering System – Accounts for funds collected at SBA field and servicing offices for debt servicing against SBA loan balances.
- IRS 1099C System – Reports non-collectable debt from SBA borrowers as taxable income for IRS purposes.
- General Ledger Only (GLO) – Transmits updates and keeps the Financial Reporting Information System (FRIS) and the Joint Accounting and Administrative Management System (JAAMS) synchronized with the Loan Accounting System.
- Litigation & Liquidation Tracking System – Tracks collateral liquidation and loan liquidation activities.
- Microloan Mainframe – A subsystem of the Loan Accounting System specifically for processing SBA Microloans.
- Preauthorized Debit – Allows borrowers to automatically make SBA loan payments from their bank accounts.
- Treasury Offset System – Allows IRS Tax Refunds to be seized and paid on SBA delinquent or written-off loans.

SBA could save approximately $225,000 years by consolidating from 10 systems to one system. Currently SBA expends $250,000 every three years to certify and accredit 10 systems for performing C&A reviews. With the consolidation of the separate LAS/LADUC application systems into an overall LAS/LADUC major application system, SBA should be in a better position to manage its IT security funds spent performing C&A reviews and achieve economies of scale in performing one overarching C&A on the LAS/LADUC system.

Recommendations: We recommend that the Chief Information Officer in conjunction with the owners of the Loan Accounting System / Loan Accounting Daily Update Cycle:

1A. Consolidate within the Loan Accounting System / Loan Accounting Daily Update Cycle the following identified SBA major systems:
   - Credit Bureau Reporting,
   - Delinquent Loan Collection System,
   - Field Cashiering System
   - General Ledger Only
   - IRS 1099C System,
   - Loan Litigation & Liquidation Tracking System,
   - Microloan Mainframe,
   - Preauthorized Debit System, and
   - Treasury Offset System.

1B. Carry forward all individual risks in SBA's Plan of Actions and Milestones (POA&M) for the Loan Accounting System to include the recommended consolidated systems in recommendation 1A.

SBA Response:

1A: OCIO partially agrees with the recommendation. The OCIO believes that General Ledger Only (GLO) should be rolled up under LAS/LADUC.

1B: Agree.

OIG Comment:

We modified the report to reflect that GLO is included in the LAS/LADUC consolidated system.

Finding 2:   Consolidate Five Existing Financial Application Systems into a new Denver Finance Center Application System

Five current SBA systems utilized by the Office of Chief Financial Officer (OCFO) as part of its Office of Financial Systems (OFS) located in Denver, Colorado can be consolidated into a new Denver Finance Center System (DFCS) major application. These five systems can be consolidated as they perform functions such as feeder systems,

subsystems, or reporting functions which allow for complete and accurate financial reporting of financial operations at SBA. If this consolidation is performed correctly, it can occur without any loss in meeting the underlying Federal security requirements for the systems.

The following five SBA systems are identified (See Appendix C):
- Cash Reconciliation System – Reconciles different transactions and reports from Treasury. While the system is stand-alone, it is part of DFC's systems which support SBA's financial statements.
- OFS Automated Distributed Event Processing System – A feeder system to the Loan Accounting System which uploads and downloads transactions from and to Client/Server sub-applications at the Denver Finance Center.
- OFS Disbursement System – An interface system which consolidates disbursements from other SBA major systems and transmits a payment tape to the Treasury Department for subsequent cash disbursements.
- OFS Loan Accounting System – An accounting transaction system to reconcile and balance financial information from other SBA systems to the Loan Accounting System.
- OFS Print 1201 System – An output file with loan and account billing information which is transmitted to a contractor for printing for of bills owed to SBA.

SBA could save approximately $75,000 by consolidating from five systems to two systems (one application system and one general support system as discussed in Finding #3). Currently SBA expends $125,000 to certify and accredit five systems for performing C&A reviews. With the consolidation of the separate OFS application systems into an overall DFCS major application system, SBA should be in a better position to manage its IT security funds spent performing C&A reviews and achieve economies of scale in performing one overarching C&A on the DFCS application system.

Recommendations: We recommend that the Chief Information Officer in conjunction with the Chief Financial Officer:

2A.   Consolidate into a new Denver Finance Center System (DFCS) the following SBA identified major systems:
- Cash Reconciliation System
- OFS Automated Disbursement Event Processing System
- OFS Disbursement System
- OFS Loan Accounting System
- OFS Print 1201 System

2B.   Carry forward all individual risks in SBA's Agency Plan of Actions and Milestones into the new DFCS for the consolidated systems identified in recommendation 2A.

SBA Comment:

2A: Agree

2B: Agree

Finding 3:   Certify and Accredit a new Denver Office of Financial Systems Data Service System

Currently the OCFO Denver Finance Center maintains and operates a number of event processors, file servers, snap servers, and web servers which are certified and accredited as part of SBA's Local Area Network/Wide Area Network (LAN/WAN) system accreditation. However, these systems are locally managed and operated and support a departmental data center (OFS). Therefore, we conclude that these systems should be under separate accreditation as a general support system.

OMB Circular A-130 defines a General Support System as an interconnected set of information resources under the same direct management control which shares common functionality. A system normally includes hardware, software, information, data, applications, communications, and people. A system can be, for example, a local area network (LAN) including smart terminals that support a branch office, an agency-wide backbone, a communications network, a departmental data processing center including its operating system and utilities, a tactical radio network, or a shared information processing service organization.

Recommendations:

3A.   We recommend that the Chief Information Officer, in conjunction with the Chief Financial Officer designate the computerized hardware, firmware and software supporting the Denver Office of Finance Services Data Service System as a general support system. Additionally, carry forward those individual risks relating to the Denver OFS hardware, firmware and software which are reported in the existing OFS Infrastructure C&A.

SBA Response:

3A: Partially Agree. The name will be changed to Denver OFS Data Service System and it will be included as a new GSS in the September FISMA report. A new C&A will be conducted for this GSS by the end of 4th quarter. The platform vulnerabilities from the Denver Finance Center Major Application, including the OFS Infrastructure (ADEPS), will be addressed and revalidated in the new C&A of the Denver Finance Center System.

OIG Comment:

We modified the report to reflect the recommended name as requested by SBA.

Finding 4: Consolidate Two Major Systems into Two Other Major Systems

Currently, there are four major systems, of which two major systems can be consolidated into the C&A's of two remaining systems. If this consolidation is performed correctly, it can occur without any loss in meeting the underlying Federal security requirements for the systems. The two systems are:

Financial Institution Record System (FIRS) – A data base that contains information on all types of financial institutions which participate in SBA lending programs. FIRS can be consolidated with the Partner Identification and Management System (PIMS). PIMS is a web-based system designed to replace FIRS when SBA migrates off its legacy mainframe. At the present time, both systems interface with each other to maintain information on financial institutions.

Internet Connectivity Infrastructure (ICI) – Internet Connectivity Infrastructure and SBA's Local Area Network and Wide Area (LAN/WAN) are really different aspects of the same general support system. According to their C&A's:

- ICI is the supporting infrastructure of servers, firewalls, routers and servers including the public access server which allows the public to access SBA web pages and also SBA personnel to utilize the internet.
- LAN/WAN is the system and infrastructure which allows SBA employees to have networked computers, printers, email, and access to SBA's major applications.

Currently, SBA can expect to save about $50,000 every three years (two systems at $25,000) to recertify the separate systems identified above which can be consolidated into one general support systems LAN/WAN and one major application PIMS/FIRS.

Recommendations: We recommend that the Chief Information Officer:

4A. In conjunction with the Office of Financial Assistance, consolidate the Financial Institution Record System into the Partner Information and Management System (PIMS).

4B. Consolidate the Internet Connectivity Infrastructure (ICI) with the Local Area Network/Wide Area Network (LAN/WAN) for C&A purposes.

4C. Carry forward all individual risks in SBA's Agency Plan of Actions and Milestones into the new PIMS/FRIS, and LAN/WAN respectively for the recommendations 4A and 4B.

SBA Response:

4A: Agree.

4B: The Chief Financial Officer (CFO) agrees with the consolidation of systems as defined in Finding 4, with one exception. The CFO believes that the GLO system should be consolidated in with the LADUC system, not *the* FRIS system. The GLO system feeds LADUC (LAGD02), not FRIS, and does not serve any purpose in the administrative accounting system. As such, it is just another system, maintained by the OCIO that feeds LAS. Furthermore, including GLO in with the FRIS will introduce a number of vulnerabilities which OFS Denver cannot address, since they do not maintain or "own" this system. Future enhancements to FRIS may include GLO functionality, however, until that happens, the CFO feels that it should most appropriately be grouped with LADUC.

4C: Agree. The Local Area Network, Wide Area Network, and Internet Connectivity Infrastructure (LAN/WAN/ICI) would be shortened to "Local Area Network and Wide Area Network (LAN/WAN).

4D: Partially agree. GLO risks will carry forward to the new LADUC.

OIG Comment:

We modified the report to reflect that GLO be included within LADUC instead of combining it with FRIS. Additionally, we modified the report and dropped ICI from LAN/WAN.

Finding 5:   Alter the Boundaries of the Sybase General Support System and Identify it as Headquarters Data Services System

Currently SBA's Sybase General Support System is the underlying infrastructure of application services for a number of client-server applications operated by the Washington based Headquarters Data Services system (HQDS). Some of these client-server applications are stand-alone and some of these applications interface with the legacy mainframe on a daily basis. Without these services, SBA's Loan Accounting System could not fully operate as it is a hybrid system of client-server and mainframe capabilities.

SBA identified that the current name and boundaries of the Sybase C&A does not fully represent the full functionality performed and the future architecture of the general support system which will support the HQDS system. SBA further identified that currently there are a number of DBMS systems along with Sybase and that SBA is migrating to Oracle as the agency-wide DBMS. Finally, SBA is migrating to a Java Platform Enterprise Environment (J2EE) for application services.

This would include:
- UNIX Solaris operating system,
- Webservers for webpages,
- Application servers for housing application business logic, and
- Database servers for data storage.

To correctly and completely identify the underlying general support system which maintains application functions performed at the HQDS, SBA suggested an overall boundary of IT functions for application services in one C&A renamed as the Headquarters Data Services system.

Recommendations: We recommend that the Chief Information Officer:

5A. Alter the boundaries of the Sybase general support system to include all application support capabilities for client-server applications performed at the Washington Headquarters Data Center and rename the general support system as the Headquarters Data Services system.

5B. Carry forward all individual risks in the Sybase servers C&A to SBA's Agency Plan of Actions and Milestones into the new WDC Application Services general support system C&A.

5C. Perform a new C&A on the WDC Application Services general support system as the underlying application services are changed as per NIST 800-37.

SBA Response:

5A: Partially agree. For the June FISMA report, the Sybase System will be retained as a GSS. For the September FISMA report, the new Washington Data Center (WDC) Application Services System GSS will be introduced. This new system will encompass the current Sybase data servers as well as the web servers and application servers used to access the Sybase data servers. The scope will include the web servers currently accredited as part of the ICI.

5B: Partially agree. The Washington Data Center Applications Services Systems would be changed to the "Headquarters Data Services (HQDS)" system. The Sybase GSS vulnerabilities will be addressed and revalidated in the C&A of the new HQDS Application Servers GSS. The vulnerabilities associated with the ICI web servers will be addressed and revalidated in the C&A of the WDC Applications Services GSS.

5C: Agree. A new C&A will be conducted for the WDC Application Services GSS in accordance with NIST Special Publication 800-37 guidance.

OIG Comment:

We have modified the report to reflect to reflect the recommended name as requested by SBA.

Finding 6:   Decertify Five Existing Systems which do not meet the Definition of Major Systems

Five current SBA systems identified as major systems can be decertified as these systems do not meet the definition of a major system. While the information in these systems is vital to different offices within SBA in allowing those offices to perform their duties, the information within those systems do not meet the definitions of a major system from an Agency prospective and should therefore be classified as a nonmajor system.

OMB Circular A-11, Section 300, identifies a major IT investment as a system or investment that requires special management attention because of its importance to an agency's mission; investment was a major investment in the FY 2004 submission and is continuing; investment is for financial management and spends more than $500,000. Systems not considered "major" are "nonmajor."

During interviews with SBA personnel and from reviewing system documentation, we identified five systems which could be decertified and therefore, identified as nonmajor systems. These five systems are:

- Fresno Action Trek – A loan inventory system used to track SBA loan servicing actions.
- Preferred Loan Processing – Provides facsimile support for loan applications received from lenders requesting SBA guarantee of small business loans.
- Dynamic Small Business Search (ProNet) – Initially a small business search data base and engine, ProNet was combined with a Department of Defense system to allow for one integrated search of small business contractors.
- Guaranty Loan Reporting System – Previously reported on the status of SBA-1502 reports received from Colson Fiscal Transfer Agent. The system currently does not exist.
- Sacramento LowDoc – A spreadsheet program which tracks the receipt of facsimiles of loan applications received from SBA sponsored financial institutions.

Currently, SBA can expect to save about $125,000 every three years (five systems at $25,000) by identifying these systems as nonmajor and by not performing a full-scale C&A on these systems. SBA will be able to utilize the $125,000 in better securing those systems which meet FISMA criteria as general support systems or major applications.

Recommendations: We recommend that the Chief Information Officer:

6A. In conjunction with the Office of Financial Assistance, declassify the following non-major IT systems: Fresno Action Trek, Preferred Loan Processing, Guaranty Loan Reporting System and Sacramento LowDoc.

6B. In conjunction with the Office of Government Contracting and Business Development, declassify Pro-Net as it is a non-major IT system.

SBA Response:

6A: Agree.

6B: Partially agree. TechNet should be a major application per the System Owner.

Please note: LLMS is the system name per the System Owner, not Expert Behavior.

OIG Comment:

We modified the report to include TechNet as a major system. TechNet was initially identified as a non-major IT system in the draft report. We also modified the name of the Loan Lender Monitoring System in Appendix A.

* * *

The findings included in this report are the conclusions of the Auditing Division based upon the auditors' review of SBA's general support systems and major applications. The findings and recommendations are subject to review and implementation of corrective action by your office following the existing Agency procedures for audit follow-up and resolution.

This report may contain proprietary information subject to the provisions of 18 USC 1905. Do not release to the public or another agency without permission of the Office of Inspector General.

Should you or your staff have any questions, please contact Jeffrey R. Brindle, Director, Information Technology and Financial Management Group, at (202) 205-[FOIA Ex. 2].

Attachments

LIST OF MAJOR SYSTEMS WHICH MEET FISMA CRITERIA AS GENERAL SUPPORT SYSTEMS OR MAJOR APPLICATIONS

System	Owner	General Support System	Major Application
DENVER OFS Data Service System	OCFO	1	
Eagan Mainframe	OCIO	1	
LAN/WAN	OCIO	1	
Headquarters Data Services – HQDS (Formerly Sybase Servers)	OCIO	1	
8a SDM MIS	GCBD		1
ALCS	ODA		1
Consolidated LAS/LADUC	COO		1
Contract Loan Servicing (Formerly Colson)	OFA		1
DCMS	ODA		1
Denver Finance Center Sys	OCFO		1
E-Tran (Formerly ELOS)	OFA		1
Loan Lender Monitoring System (LLMS)	OLO		1
Financial Reporting Info Sys (FRIS)	OCFO		1
HUBZone Application System	Hubzn		1
JA2MS	OCFO		1
MPERS (Formerly Microloan Data Entry)	OFA		1
Partner Identification Mgt Sys	OFA		1
SBA Payroll/Personnel System (NFC)	OHCM		1
Surety Bond Guarentee (SBG)	OSG		1
TechNet	GCBD		1
Total General Support Systems and Major Applications		4	16

LIST OF CURRENT MAJOR SYSTEMS WHICH CAN BE CONSOLIDATED INTO THE LOAN ACCOUNTING SYSTEM (Finding #1)

System	Owner	Major Application
Consolidated LAS/LADUC	COO	1
Credit Bureau Reporting (CBR)	OFA	
Delinquent Loan Collection (DLC)	OFA	
Field Cashiering System	OCFO	
General Ledger Only	OCFO	
IRS 1099C Reporting (IRS)	OFA	
Litigation & Liquidation Tracking Sys (LLTS)	OFA	
Microloan-Mainframe (MM)	OFA	
Pre-Authorized Debit System (PADS)	OCFO	
Treasury Offset (TO)	OFA	

LIST OF CURRENT MAJOR SYSTEMS WHICH CAN BE CONSOLIDATED INTO A NEW DENVER FINANCE CENTER SYSTEM (Finding #2)

System	Owner	Major Application
Denver Finance Center System	**OCFO**	1
Cash Reconciliation System (CRS)	**OCFO**	
OFS Disbursement (OFS Dis)	**OCFO**	
OFS Infrastructure (OFS Infa)	**OCFO**	
OFS LA Accounting	**OCFO**	
OFS Print 1201 (OFS Pri)	**OCFO**	

U.S. Small Business Administration
Washington, D.C.

May 12, 2005

To: Robert G. Seabrooks
        Assistant Inspector General for Auditing

        /S/ Original Signed
From: Jerry E. Williams
        Acting Chief Information Officer

Subject: Response to Consolidation of Small Business Administration's Systems (SBA)
          Subject to the Federal Information Management Act

Thank you for the opportunity to review and provide comments to the draft memorandum advisory report on Consolidation of SBA's Systems Subject to the Federal Information Security Management Act of April 14, 2005.

The Office of the Chief Information Officer met with SBA system owners to discuss and reach a consensus on your consolidation recommendations. The attachment contains the results of the discussions and identifies the actions the OCIO plans to take.

Should you or your staff have any questions about the attached comments, please contact Ethel M. Matthews, Chief Information Security Officer at (202) 205-[FOIA Ex. 2].

Attachment

cc:
Jennifer Main
Peter McClintock
Stephen Kucharski
James VanWert

OCIO Response:

1A: OCIO partially agrees with the recommendation. The OCIO believes that General Ledger Only (GLO) should be rolled up under LAS/LADUC.

1B: Agree.

2A: Agree

2B: Agree

3A: Partially Agree. The name will be changed to Denver OFS Data Service System and it will be included as a new GSS in the September FISMA report. A new C&A will be conducted for this GSS by the end of 4th quarter. The platform vulnerabilities from the Denver Finance Center Major Application, including the OFS Infrastructure (ADEPS), will be addressed and revalidated in the new C&A of the Denver Finance Center System.

OCIO / OCFO Response:

4A: Agree.

4B: The Chief Financial Officer (CFO) agrees with the consolidation of systems as defined in Finding 4, with one exception. The CFO believes that the GLO system should be consolidated in with the LADUC system, not *the* FRIS system. The GLO system feeds LADUC (LAGD02), not FRIS, and does not serve any purpose in the administrative accounting system. As such, it is just another system, maintained by the OCIO that feeds LAS. Furthermore, including GLO in with the FRIS will introduce a number of vulnerabilities which OFS Denver cannot address, since they do not maintain or "own" this system. Future enhancements to FRIS may include GLO functionality, however, until that happens, the CFO feels that it should most appropriately be grouped with LADUC.

4C: Agree. The Local Area Network, Wide Area Network, and Internet Connectivity Infrastructure (LAN/WAN/ICI) would be shortened to "Local Area Network and Wide Area Network (LAN/WAN).

4D: Partially agree. GLO risks will carry forward to the new LADUC.

OCIO Response:

5A: Partially agree. For the June FISMA report, the Sybase System will be retained as a GSS. For the September FISMA report, the new Washington Data Center (WDC) Application Services System GSS will be introduced. This new system will encompass the current Sybase data servers as well as the web servers and application servers used to access the Sybase data servers. The scope will include the web servers currently accredited as part of the ICI.

5B: Partially agree. The Washington Data Center Applications Services Systems would be changed to the "Headquarters Data Services (HQDS)" system. The Sybase GSS vulnerabilities will be addressed and revalidated in the C&A of the new HQDS Application Servers GSS. The vulnerabilities associated with the ICI web servers will be addressed and revalidated in the C&A of the WDC Applications Services GSS.

5C: Agree. A new C&A will be conducted for the WDC Application Services GSS in accordance with NIST Special Publication 800-37 guidance.

6A: Agree.

6B: Partially agree. TechNet should be a major application per the System Owner.

Please note: LLMS is the system name per the System Owner, not Expert Behavior.

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