

## MAKING CHANGES TO CBS SOFTWARE

.01 At no time will a bureau make modifications to CBS Software without the express written approval of the Director, Financial Management Systems or designee.

.02 If the Director, Financial Management Systems or designee approves a bureau's request to make modifications to the CBS software and these changes exceed the CSC's available resources, OFM/CSC may authorize the bureau to provide its own resources to complete requirements, design, programming, testing, and documentation assignments according to a separate Memorandum of Understanding (MOU). The MOU shall include the following:

a. A description of the full range of bureau resources (the bureau software change support team) required to meet the agreed-upon schedule and complete the assignment. The assignment may include the development of a requirements document, a design document, updates to user manuals, modifications to software code, and acceptance testing scripts. The bureau software change team will be responsible for making any required changes and gaining the approval of the CBS bureau community. Unless agreed to by the OFM/CSC, the full cost of the bureau resources shall be borne by the bureau.

b. The requirement that all tasks shall be completed according to OFM/CSC procedures and standards.

c. The requirement that code changes to CBS software be initiated via the OFM/CSC help desk and software delivery scheduling process. All programming changes must be approved by the CBS software change process as managed by the OFM/CSC Systems Support Division Director and must follow the OFM/CSC software change control policies, procedures and standards. This will also include the requirement for the bureau software change team to "check the code out" of the OFM/CSC facility for software code development, software code changes, and acceptance testing.

d. The requirement that the bureau software change team shall provide the OFM/CSC a software delivery schedule, that is, a full project plan, and shall be required to meet that schedule. The OFM/CSC must approve a plan for all software change activities to be completed by a bureau team and must agree that resources have been identified as needed to complete all required tasks in the OFM/CSC software development life cycle before software change activities may begin. If a bureau software change team finds it necessary to propose a revised delivery schedule, it must be approved by the OFM/CSC and the CBS bureaus before the schedule is revised. Should the bureau team fall behind schedule, or vary from policies, procedures or standards, the Director, Financial Management Systems shall have the discretion to terminate the work until such time as appropriate resources become available to complete the work satisfactorily.

e. The requirement that the bureau software change team shall provide support to the OFM/CSC acceptance testing team as required by the OFM/CSC test team leader and shall be responsible for correcting any errors in the delivered code found by the OFM/CSC test team according to the mutually agreed-upon schedule. Once the OFM/CSC test team accepts the code from the bureau, the bureau is free of any further software change responsibilities.

03. If a bureau has a need to interface a bureau-specific feeder system with CBS software, the bureau will use the appropriate CBS standard interface.

04. A bureau shall not write and execute program code that changes the data content of tables in the production CFS, thereby bypassing the edits and controls inherent in the CBS software, except as authorized pursuant to the OFM/CSC Procedure to Change Data in Core Financial System Database Tables.

## DEVELOPMENT OF BUREAU-SPECIFIC PROGRAMS

.01 The CBS software specifically includes data warehouse and application software to facilitate bureau reports and queries and to help minimize cascading effects when changes are made by OFM/CSC to CBS on-line transaction database or CBS software.

.02 Bureaus may create bureau-specific reports and tables as needed without consulting with the OFM/CSC or obtaining permission from the OFM/CSC within the boundaries established below.

- a. Bureaus may not change OFM/CSC maintained tables and database objects.
- b. Bureaus may create reports as they choose as long as these reports and screens do not duplicate standard general ledger, sub-ledger, and formal financial statements available in the CBS software or substitute for similar functionality in the CBS Software.
- c. Bureaus may add bureau-specific programs to the CBS menu, but may not change the CBS menu programs.
- d. Bureaus may create interfaces to load bureau-specific data into bureau-created tables.
- e. The OFM/CSC will work with bureaus to minimize the impact any CBS software changes will have on bureau reports/queries, by developing reports against the data warehouse.
- f. Bureau-created reports which run against the CBS on-line transaction databases (currently this includes the CFS and purchase card systems) shall not be considered a factor in the planning and execution of any system changes to the CBS software and shall not be a factor in, or delay the bureau roll-out of, such changes.

## REMEDIATION OF NON-COMPLIANT CBS AND BUREAU SOFTWARE

.01 It is recognized that there were circumstances over the course of implementing CBS in the DOC in which customization of interfaces or CBS software code may have taken place which would cause a bureau to be non-compliant with the terms set forth in this DAO. These could include:

- a. Customized interfaces between administrative systems containing financial information and CBS database tables.
- b. Direct integration of administrative systems and CBS database tables.
- c. Customization or replacement of some aspect of CBS software functionality.

.02 Remediation Procedures

a. Identification of Non-compliant Instances. Bureaus are required to analyze their CBS production environments (both CBS and bureau software), identify all occurrences of code not in compliance with this DAO, and submit a report of non-compliance to the OFM/CSC.

b. Plans to Achieve Full Compliance. Within three months of the OFM/CSC receiving non-compliance reports from the bureaus, each bureau will do the following:

1. Develop a plan that describes the activities required to achieve compliance for each non-compliant occurrence and the dates by which compliance must be achieved for each.

2. Submit this plan to the OFM/CSC.

(a) For interface compliance, the bureau plan will either:

- (1) reference a date by which the OFM/CSC will provide a new standard interface and a date by which the bureau will implement that interface, or

- (2) reference a date by which an existing administrative system will be modified or replaced and an existing standard interface will be used to connect that administrative system to the CBS tables.

(b) For integration compliance, the bureau plan will reference a date by which the administrative system will be modified or replaced so that an existing standard interface will be used, or a new standard interface provided by OFM/CSC will be used.

3. For CBS code compliance, the bureau plan will either state its plan to submit a request to the Technical Advisory Council for approval to incorporate the bureau's modified code as standard CBS code for all bureaus, and which the OFM/CSC will own and maintain in the future, or the plan will reflect dates by which the bureau will modify its business processes to be able to use the CBS software maintained by the OFM/CSC.

.03 Acknowledgment of Compliance

- a. The OFM/CSC will monitor bureau plans to reach compliance with the DAO, and will determine when a bureau attains compliance. The OFM/CSC will provide written notice to the appropriate bureau that it has officially corrected a condition that could have been deemed non-compliance with the DAO.
  
- b. If a bureau fails to meet the milestones in its compliance plan, fails to reach an agreement with the OFM/CSC on a modified plan, or fails to adhere to the procedures outlined in this section, the OFM/CSC will issue a memorandum of non-compliance to the bureau.

RULES OF BEHAVIOR  
U.S. DEPARTMENT OF COMMERCE  
COMMERCE BUSINESS SYSTEMS (CBS) SOURCE CODE

1. Introduction

The following rules of behavior are to be followed by all government and contractor staff with access to the DOC CBS source code. These rules delineate the responsibilities of these individuals. Non-compliance with these rules will be enforced by sanctions commensurate with the level of infraction. Sanctions may include a verbal or written warning, removal of system access for a specific period of time, reassignment to other duties, and/or disciplinary action up to and including removal, depending on the severity of the violation.

2. Responsibilities

a. All individuals with access to the CBS source code will protect it from licensing agreement violations, unauthorized modifications, or destruction, and contractors shall abide by the non-disclosure agreement. Neither government nor contractor personnel are allowed to make or transport copies of the CBS source code outside bureau-controlled facilities unless advance written permission has been granted by the authorized bureau CBS manager or designee on a case-by-case basis. At the end of the authorization period, the requestor will either return the source code copy to the authorized bureau CBS manager or designee, or provide written notice to the bureau CBS manager or designee that the copy has been destroyed.

b. The authorized bureau CBS manager or designee is responsible for determining access authorization and for maintaining an up-to-date list of all bureau personnel who have been granted access to the CBS source code. This list will include the name of the requestor, medium onto which the CBS source code was copied, location to which copy is to be transported, purposes of use, and duration of authorization.

3. Other Policies and Procedures

These rules are not to be used in place of existing policy; rather, they are intended to enhance and further define the specific rules in Department Administrative Order 203-31, "Protection of Commerce Business Systems (CBS) Source Code," which each user must follow while accessing the CBS source code.

I acknowledge receipt of, understand my responsibilities for, and will comply with the rules of behavior for the CBS source code.

\_\_\_\_\_  
Name of User (Printed)

\_\_\_\_\_  
Organization Name

\_\_\_\_\_  
Signature of User

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Bureau CBS Manager or Designee

## REQUEST FOR CBS SOURCE CODE

This form will be used by bureau personnel to request copies of the CBS source code. Section 1 is to be completed by the requestor. Sections 2 and 3 are to be completed by the bureau CBS manager or designee.

By completing and submitting this request form, the requestor agrees to protect the CBS source code from licensing agreement violations, unauthorized modifications, or destruction. At the end of the authorization period, the requestor will either return the source code copy to the authorized Bureau CBS Manager or designee, or provide written notice to the bureau CBS manager or designee that the copy has been destroyed.

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 SECTION 1 – To be completed by requestor

 \_\_\_\_\_  
 Date

 \_\_\_\_\_  
 Name of Requestor

 \_\_\_\_\_  
 Office of Requestor

Reason for request and intended use of source code:

Medium onto which source code will be copied:

Location to which copy is to be transported:

Estimated duration for use of source code:

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 SECTION 2 – To be completed by the bureau CBS manager or designee

I authorize this employee/contractor to:

\_\_\_\_\_ Make a copy of the CBS source code

\_\_\_\_\_ Transport a copy of the CBS source code outside of bureau-controlled facilities

 This authorization is good through \_\_\_\_\_  
 Date

 \_\_\_\_\_  
 Name

 \_\_\_\_\_  
 Title

 \_\_\_\_\_  
 Date

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 SECTION 3 – To be completed by the bureau CBS manager or designee

\_\_\_\_\_ The employee/contractor returned the copy of source code.

\_\_\_\_\_ The employee/contractor has destroyed the copy of the source code. See attached memo verifying the destruction of the source code.

 \_\_\_\_\_  
 Name

 \_\_\_\_\_  
 Title

 \_\_\_\_\_  
 Date

NON-DISCLOSURE AGREEMENT

1. Any information made available to a contractor with regard to the CBS source code shall be used only for the purpose of accomplishing the assigned work and shall not be divulged, used, published, transmitted or made known in any manner to any other person except as may be necessary for the performance of assigned work or as expressly authorized by the bureau management official, or as required by law.

2. The contractor shall protect the confidentiality of the CBS source code in the same manner he/she protects the confidentiality of his/her own proprietary and confidential information of a similar nature. Access to the CBS source code shall be restricted to those individuals who process it. The source code includes:

a. Software developed by the government that the government makes available to the contractor.

b. Software that the contractor develops, or software enhancements developed by the contractor, that become part of the CBS software.

c. Software that the contractor develops to design or test the CBS software.

d. Documentation on the technical design, architecture, or training materials for the CBS source code.

\_\_\_\_\_  
Name of User (Printed)

\_\_\_\_\_  
Organization Name

\_\_\_\_\_  
Signature of User

\_\_\_\_\_  
Date