FITARA Common Baseline Implementation Plan

Fiscal Year 2016



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1.0 PURPOSE AND INTRODUCTION

1.1 Purpose of the FITARA Common Baseline Implementation Plan

The Federal IT Acquisition Reform Act (FITARA) was enacted on December 19, 2014, outlining specific requirements related to:

- Chief Information Officer (CIO) Authority Enhancements
- Enhanced Transparency and Improved Risk Management in Information Technology Investments
- Portfolio Review
- Expansion of Training and Use of Information Technology Cadres
- Federal Data Center Consolidation Initiative (FDCCI)
- Maximizing the Benefit of the Federal Strategic Sourcing Initiative (FSSI)
- Government-wide Software Purchasing Program

OMB provided specific guidance on the implementation of this Act across the federal sector to ensure that government-wide implementation is consistent with existing laws, policies, and management practices by issuing the Management and Oversight of Federal IT memorandum M-15-14.

OMB's guidance states that each covered agency shall conduct a self-assessment that identifies current conformity or gaps in conformity with the Common Baseline, and articulates an implementation plan describing the changes it will make to ensure that all Common Baseline responsibilities are implemented. The self-assessment shall include a discussion of how agency senior leaders and program leaders will work in partnership to facilitate the successful implementation of the Common Baseline and how the agency CIO will be enabled as a strategic partner integrated in shaping Agency strategies, budgets, and operations. The Chief Management Officer (CMO) for OPM will be responsible for the completion of this implementation plan.

1.2 Introduction

The initial OPM self-assessment and the project schedule were submitted to OMB in August 15, 2015 and included OPM's plan to address all baseline FITARA responsibilities. OMB provided comments on November 9, 2015 and more detailed comments in the meeting held on November 13, 2015. Based on these discussions and other input from OMB, OPM developed a more detailed document to explain what existing practices are in place and a discussion as to how OPM senior leaders and program leaders will work in partnership to facilitate the successful implementation of the Common Baseline. This plan also addresses how the agency CIO will, as a strategic partner, be integrated in shaping Agency strategies, budgets, and operations. OMB approved OPM's plan on February 2, 2016. The plan has been further revised for clarity; and upon OMB re-review and re-clearance, it will be posted on OPM's public website.

To provide further context regarding how OPM will achieve the goals in its Common Baseline Implementation Plan, OPM's plan contains information about its Life Cycle Management Process, as well as its planned future IT governance framework. Recognizing both the importance of information technology (IT) investments to the organization and its role in supporting the success of these IT investments, OPM's IT Investment Management office, under the CIO, is engaged in an on-going effort to establish, maintain, and actively

support the IT investment analysis and decision-making process. OPM's Capital Planning and Investment Control (CPIC) process has been designed to manage IT investments to ensure each chosen IT investment is well-managed, cost-effective, and supports the mission and strategic goals of the Agency. OPM has a draft policy under review on Information Technology Life Cycle Management (LCM) that will further improve the oversight of IT investments. At OPM, the Life Cycle Management phases have taken into account in their design lessons learned from past challenges and successes and are now better positioned to manage sound IT investment decision-making throughout the IT investment lifecycle.

OPM has made progress in its governance of technology thus far, and it continues to mature its processes, but work remains to be done. In the future, we foresee that IT investments in major information systems will be evaluated so that they:

- Support core/priority mission functions of the agency and the Federal government.
- Support work processes that have been evaluated for simplification or otherwise redesigned to reduce costs, improve effectiveness, and make maximum use of commercial, off-the-shelf (COTS) technology.
- Demonstrate a projected return on the investment that is clearly equal to or better than alternative uses of available public resources.
- Are consistent with Federal, Agency, and bureau information architectures which: integrate Agency work processes and information flows with technology to achieve the Agency's strategic goals; and specify standards that enable information exchange and resource sharing, while retaining flexibility in the choice of suppliers and in the design of local work processes.
- Reduce risk by incorporating cybersecurity technology and practices into the design and operation of systems being developed or implemented, seek active engagement from those who will use the system, and pilot and test the system throughout its lifecycle.
- Are implemented in phased, well-defined segments, as narrow in scope and brief in duration as practicable, each of which solves a specific part of an overall mission problem and delivers a measurable net benefit.
- Employ an acquisition strategy that appropriately allocates risk between government and contractor, effectively uses competition, ties contract payments to accomplishments, and takes maximum advantage of commercial technology.

1.3 Life Cycle Management Process

As outlined below, OPM has drafted a Life Cycle Management process which envisions Pre-Select activities as well as Select, Control, and Evaluate phases. The process is iterative, incorporating plans from all of the Agency programs, and feeding outputs into the budget and investment control processes. The goal is to link resources to results. The Agency's process is built on OPM's current and evolving Enterprise Architecture (EA), which we continue to document and refine, as it transitions from current architecture to the future-state target architecture that will reside in our secure Shell environment.

The draft Life Cycle Management process at OPM is summarized in the following diagram:

Inputs into LCM Process	Pre- Select Select Control Evalua	Outputs of LCM Process
eCPIC	Program Offices Update Investment Investments submit Evaluate	Approved IT portfolio that
Budget Process	identify and pre- Data monthly cost, implemented select initiatives • Establish scoring schedule and projects (Post	supports OPM's
EA Documents	Define criteria performance data Implementation requirements and Review for IT Dashboard Review)	Mell managed
OPM and IT Strategic Plan	complete need- • Rank reporting • Evaluate indivistatement • Select • Report investment IT investment • Complete CONOPS • Recommend IT performance data performance	dual investments that achieve cost, schedule, and
OMB Guidance	Program Offices portfolio to OPM to IT Dashboard (Operational develop business Director Provide EVM data Analysis) Program Offices portfolio to OPM to IT Dashboard (Operational Analysis) Program Offices portfolio to OPM to IT Dashboard (Operational Analysis) Program Offices portfolio to OPM to IT Dashboard (Operational Analysis)	performance goals
Project Management	cases in conjunction with IT PMs assessment data for practices and health of lessons learner investment • Capture best earner investment	Lessons learned

PRE-SELECT

During the Pre-Select Phase, OPM will assess proposals for IT solutions to meet business requirements. Once a basic understanding of the requirement is captured, the agency will first explore assets within its portfolio for consideration. Assets identified as potentially satisfying in full or part will become a basis for evaluating alternatives. Governance processes, such as the Capital Investment Committee or the Investment Review Board (see section 1.3 for additional details) will be tasked to ensure that each of the alternatives are evaluated for cost, security, process efficiency, and alignment to the Agency's strategic plan and mission needs.

The Pre-Select Phase provides an opportunity to gain an early look at a set of requirements, possible solution alternatives, and the development of a recommended approach and prioritization as compared to competing initiatives. This allows the agency to focus efforts on prioritized activities in line with available resources. It allows project teams to begin the process of defining technical requirements, implementation alternatives, benefits, and macro cost estimates. This work begins to lay the foundation for a business case and initial project plan for inclusion in the Agency's IT investment portfolio. The business owners, in coordination with their IT Project Managers, will submit their top-priority initiatives to the Chief Information Officer, who considers the submissions for inclusion in the Agency's IT portfolio.

SELECT

During the Select Phase, the Director of OPM will oversee a review of the proposed initiatives with the Agency leadership team and ultimately decide which investments are to be included in the IT Portfolio. The result of the selection process is the determination of the optimal portfolio of IT investments.

The CIO is responsible for recommending criteria by which the Director makes the decision. Today, those criteria are created and weighted at the recommendation of the CIO and concurrence of the Director. As OPM continues to develop our Life Cycle Management policy, we foresee some modification to established controls as we gain more experience in their use.

When new investments are prioritized by the Director, OCIO's IT Investment Management group assumes responsibility for tracking the decision and relevant data about those investments. The group is responsible for keeping information pertaining to all existing IT investments up-to-date, and escalating variances from budget or plan for mitigating action.

CONTROL

The purpose of the Control Phase is to ensure, through timely oversight, quality control, and executive review that IT initiatives are managed in a disciplined and consistent manner within OPM. The CIO consults with the Office of the Inspector General (OIG) on a monthly basis, or more frequently should situations arise warranting information exchange, to maintain open communications and shared understanding on the progress of major IT initiatives and investments.

All major IT investments are also subject to monthly OMB IT Dashboard reporting. The OPM CIO is provided regular reports on the status and concerns related to the OPM major investments. In the future, OPM plans to review investments using Earned Value Management System (EVMS) data where applicable, and using performance management data for investments not subject to EVMS requirements. In addition, all major investment owners provide a regular self-assessment on the performance of the investment efforts.

In addition, OPM has recently established an enterprise-wide Risk Management Council, which will focus on strategic risks impacting information technology, financial management, procurement, human capital management, privacy management, and other operational areas as determined by management.

EVALUATE

The purpose of the Evaluate Phase is to examine whether an IT investment has met its intended objectives and yielded expected benefits as projected in the business case. Moving forward, OPM intends to conduct a Post-Implementation Review (PIR) on major IT system enhancements or deployments six and eighteen months after the system is fully deployed. These reviews are not only intended to assess the investment against the business case that established the basis for its implementation, but also to assess possible improvement opportunities in our application or systems Life Cycle Management process.

Another key document in the Evaluation Phase is the Operational Analysis. The Operational Analysis will examine the current performance of an investment and measure that performance against an established set of cost, schedule, and performance parameters. The Office of Management and Budget (OMB) requires program offices to conduct operational analyses of on-going operational expenses at least annually. The results of the operational analysis will be reviewed by the Investment Management group to evaluate the effectiveness of management controls and results, and submitted to OMB. The review will also educate OCIO leadership regarding previous expenditures and future investments in new capabilities. As noted in GAO's guide to evaluating IT investments, "the Evaluate Phase 'closes the loop' of the IT investment management process by comparing actual against estimates in order to assess the performance and identify areas where decision-making can be improved."

In the future, OPM plans to strengthen management oversight by formally benchmarking IT investments against the GAO ITIM framework, and conducting ad hoc benchmarks against

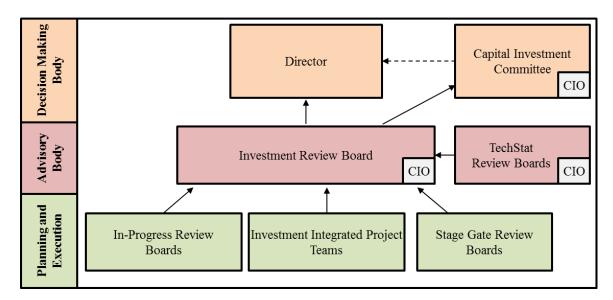
other public- and private-sector organizations as possible.

1.4 Planned Future-State IT Governance Framework

This section describes the governance structure OPM has planned to implement to comply with FITARA regulations. Although it is not yet fully implemented, we are committed to strengthening governance of IT processes, ensuring full CIO visibility into all IT expenditures across OPM, and providing the Director of OPM with the best possible information to make the final investment decisions.

Levels of Governance

IT investments (including decisions on spending, policies, procedures, strategy, etc.) will be governed at multiple layers:



Governance Body Definitions

Director

OPM's agency principal is responsible for making all final decisions on IT policy and spending matters.

Capital Investment Committee (CIC)

The CIC is composed of OPM's senior leadership, including the CIO, and is currently chaired by the Associate Director of Merit System Accountability and Compliance (MSAC). The objectives of the CIC are: 1) Provide executive oversight of spending on capital assets as defined in OMB Circular A-11, regardless of purpose or funding type; 2) Provide the Director with information about OPM spending needs in the context of changing priorities and funding requirements; and 3) Provide the Director the opportunity to redirect funding decisions and spending plans, with respect to the agency's highest priority needs as they develop. This includes OPM spending of \$250,000 or more.

Investment Review Board (IRB)

The IRB is composed of OPM's senior leadership, organized by OCIO, and chaired by the Chief Operating Officer. The Board is the authoritative body which reviews and advises the Director on the agency's IT spending and budget plans—including investments below \$250,000—and makes investment recommendations to the Director based on business

needs. The IRB also serves as an advisory board to the Capital Investment Committee regarding IT related issues.

TechStat Review Board (TRB)

The TechStat review board, once mature, will conduct in-depth TechStats on targeted investments. According to the TechStat Toolkit, "A TechStat is a face-to-face, evidence-based review of an IT investment ... In the session, the CIO, along with other members of OPM's leadership team, meet for one focused hour; they review the analysis assembled by the TechStat team through a briefing that highlights the management of the investment, examines program performance data, and explores opportunities for improvement." TechStats may result in a recommendation to modify or terminate an IT initiative, which is presented to the Director of OPM. At OPM, TechStat reviews may be initiated by the OPM Director, the CIO, the IRB, or automatically if the investment is rated red for more than three consecutive months.

Investment Integrated Project Teams (IPT)

The IPTs include SMEs that help provide technical analysis and internal insight into how a project and/or investment is performing. Per OMB Circular A-11, "An Integrated Project Team is a multidisciplinary team led by the program manager to manage the acquisition process. Team members may change somewhat for different phases of the project, but members must represent those who have a major interest in the project. Members should be full time or dedicated to the program when needed. Members should include qualified people able to advise the program manager about technical, business, project, schedule, procurement, finance, and other issues, and identify users' concerns about the acquisition."

Stage Gate Review Boards (SGRB)

The Stage Gate reviews are led by the Chief of Investment Management and review IT investments' progress through the SDLC. Stage Gate reviews are less formal than TechStats, and do not require the participation of the CIO. However, each SGRB produces a Stage Gate Review Synopsis (D5, Appendix C), which allows the CIO and ACIOs to keep abreast on all major investment developments and potential needs for IT resources in the future. For example, the SGRB scrutinizes an investment's 5-year project budget and projects future resource needs for the CIO.

In Progress Review Boards (IPRB)

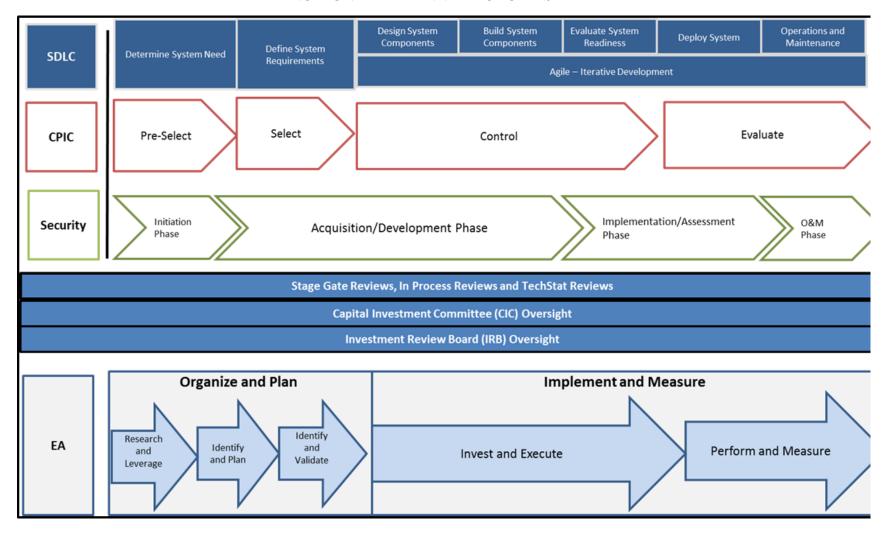
In Progress Reviews are led by the Chief Enterprise Architect and are specific to the OPM environment, because OPM is in the process of migrating systems from the legacy environment to the rationalized and secure Infrastructure as a Service environment (IaaS). The IPRB convenes regularly to evaluate all systems with a total budget greater than \$1 million, and recommends to the CIO and ACIOs which investments are ready to migrate to IaaS by assessing the following:

- System interdependencies
- Hardware and software requirements
- Security requirements
- Other topics of interest to the CIO

Ultimately, these reports will show senior management the IT resources needed to make each investment compatible with the IaaS environment.

1.5 The Integrated IT Governance Framework

NOTIONAL – PLANNED FUTURE STATE



1.6 The Common Baseline

The OMB guidance on FITARA seeks to ensure that CIOs retain accountability for the management of IT investments. It directs agencies to adopt specific controls over four stages of the investment management lifecycle for information technology. These controls work together to ensure that CIOs have visibility into and a substantial decision making role in IT investments:

- 1. Budget formulation
- 2. Budget execution
- 3. Acquisition
- 4. IT workforce management processes

This document outlines how OPM currently provides that visibility, and the additional controls it intends to implement to adapt the Common Baseline principles into its operations. This document is the result of discussions and agreements among multiple stakeholders in the process, including OPM's Chief Information Officer, Chief Procurement Officer, Chief Financial Officer, and Chief Operating Officer.

2.0 BUDGET FORMULATION AND PLANNING

2.1 Visibility of IT Resources:

Starting in fiscal year 2014, with the implementation of OPM's *Strategic Plan Fiscal Year* 2014-2018 (Appendix A.6) and the implementation of OPM's *Strategic IT Plan* (Appendix A.7), OPM began the process of re-aligning all IT development and operations into the Office of the Chief Information Officer. It started with the re-organization of the Office of the CIO in February of 2015, which gave the CIO oversight of the IT PM function for Federal Investigative Services as well as the government-wide governance of HRIT, which previously resided with the Office of Planning and Policy Analysis.

The re-organization created four new Associate Chief Information Officer (ACIO) positions, including one ACIO for Strategy and Policy responsible for investment management and enterprise architecture. The CIO also created five new Senior Level positions, to complete the centralization of all IT PM functions within CIO. All of these positions have been filled with experienced professionals as of FY 2016. In addition, OPM brought all of the Information System Security Officers (ISSOs) into the OCIO and elevated the Chief Information Security Officer (CISO) position to report directly to the CIO.

Under this new CIO structure, all budget formulation activities for information technology will be the responsibility of the ACIOs and senior leadership, starting with the FY 2018 budget cycle. For the FY 2017 budget formulation that occurred during the summer of 2015, the ACIO for Strategy and Policy led the effort, working closely with the CIO, to ensure the CIO's visibility into the process.

Starting in FY 2015, the Office of the Chief Financial Officer required the use of a detailed data collection tool for every component of OPM in order to formulate the budget. The tool collects budget requirements for all IT spending, including federal FTE costs (e.g. salaries, benefits, travel, etc.), contract services (O&M, DM&E, and other), hardware, software, and other components of CIO operations. It also ties all IT expenditures to the *Strategic IT Plan* and prioritizes IT requirements for the year. This tool gives the CIO detailed visibility into

IT spending throughout the agency and informs the annual budget process.

To address any past decentralization of IT activities and acquisitions within the agency, OPM began and continues to implement a series of controls as part of its action plan:

- OPM has implemented security tools that prevent and detect unauthorized hardware and software from being added to the OPM environment.
- CIO is working with the Director of OPM to develop a policy memorandum to all senior leadership to implement the FITARA requirement that the CIO have full visibility into all IT investments. The policy will require that program offices identify any IT components of acquisitions they make during budget formulation and execution, and report these to the CIO for approval. (Deliverable 1 (D1) Appendix C)
- Additional controls will be implemented at the budget execution level to identify any IT spend not captured during the budget formulation stage (see section titled Budget Execution).
- Senior Level IT PMs have been hired to work with all major program offices to manage any IT related activities.

2.2 CIO role in pre-budget submission:

The OPM CIO, working closely with the CFO and program offices, has the lead role in the development of the IT budget, presenting it to the Investment Review Board (IRB), and signing off on the final recommendation to the Director for submission to OMB. This lead role was well defined during the development of the FY 2017 budget, for which CIO developed both the IT budget request and the Congressional Budget Justification. These were presented to the IRB, briefed to senior staff within the Office of the Inspector General on multiple occasions, and submitted to the Director of OPM. CIO also had primary responsibility for briefing the Director and OMB on the need for a supplemental appropriation for the migration of OPM applications to IaaS and increased operational needs. In addition, the ACIO for Strategy and Policy is responsible for all Agency IT Portfolio (aka Ex.53) and Major IT Business Case (aka Ex.300) OMB submissions, and the tie in of those forms to the OPM budget request for IT investments.

OPM improved CIO and IRB visibility into IT requirements in formulating the FY 2017 budget, but we continue to mature this process. For the FY 2018 budget process, we expect the IRB will make a formal budget recommendation to the Director. OPM will also continue to mature the relationship between the CIC and IRB. The IRB currently provides insight to the CIC on IT-related matters, but the next version of the IRB Charter will formally document the requirements of this advisory relationship (D3, Appendix C). Also, in the future, OCIO will develop a Proposed Expenditures survey which will be administered annually to the individual program offices (D4, Appendix C). This survey will inform the CIO and the IRB of all their upcoming IT expenses as part of the pre-budget process.

2.3 CIO role in planning program management:

The CIO is actively engaged and accountable for planning the effective and efficient use of OPM's IT resources to achieve the objectives set forth in the OPM *Strategic Plan* and the *Strategic IT Plan*. Through one-on-one meetings with IT Project Managers throughout OPM, the CIO is regularly briefed on the progress of all investments. In the future, the CIO will strengthen current reporting requirements to include a detailed description of what IT

resources have already been expended, and to forecast future resource demands.

Also, the Investment Management division within OCIO sends the CIO regular reports detailing the progress of all investments through the Systems Development Life Cycle (SDLC) (Appendix A.4). In the future, these reports will also include EVM analysis of project activities and milestones, which will help proactively notify the CIO as to whether resources may need to be increased or decreased for a specific investment. These sources of information will inform CIO recommendations to the Capital Investment Committee (CIC) on whether funding requests over \$250,000 for IT projects should be approved or denied.

The CIO's role in program management is carefully coordinated with the program offices to ensure that IT investments meet mission and business needs, especially as OPM transitions away from its legacy environment. For example, in FY 2015, OPM stood up its new state-of-the-art infrastructure known as "Shell." In planning the migration of legacy applications to this new environment, CIO made an initial rough-order-of-magnitude cost estimate to begin the planning and initial migration of distributed applications. CIO then began conducting In-Progress Reviews (D2, Appendix C), working with program offices to identify migration requirements for program applications at a more detailed level. This process will result in more refined sequencing plans and IT expenditure forecasts or surveys for future budget formulation purposes.

CIO also conducts regular SGRBs (see section 1.3). For example, OCIO recently completed an SGRB on USAJOBS, which generated a detailed report and recommendations to the CIO and ACIOs.

2.4 CIO role in budget request:

Beginning with OPM's request for the FY 2017 budget, the CIO personally conducted a line-by-line review of IT requirements to maximize visibility into the agency-wide IT portfolio. CIO meets with the CFO to review the budget request, after which the two officials sign a joint memo affirming the CIO's "significant role" in IT budget development. The CIO and ACIOs will continue to fulfill these responsibilities in future years, and visibility into program offices' IT expenditures will only improve as the newly-hired IT Program Managers develop closer working relationships with the programs.

Although OCIO has already improved visibility and accountability in the budgeting process, OPM will take the following steps to further enhance oversight:

- OCIO and the Office of Procurement Operations will develop an *IT Acquisition Review* checklist to be used with every procurement action agency-wide that clearly details the IT portion of the acquisition. This checklist will be approved by the program office requesting the action and the CIO for any IT components. (D6, Appendix C)
- OCIO and OCFO will formalize the process followed for approval of the FY 2017 budget, thoroughly documenting roles and responsibilities for the joint approval.
 (D7, Appendix C) OCIO will also develop a memorandum that will be used as the official artifact verifying that the CFO and CIO concur on accuracy of the IT budget request. (D8, Appendix C)

3.0 BUDGET EXECUTION

3.1 Ongoing CIO engagement with program managers

The CIO has established and maintained many processes in support of CIO's consistent engagement with program managers at OPM, including meeting regularly to gain insight into the inner workings of each investment. These meetings allow CIO to determine if an investment is functioning efficiently and effectively, and meeting the objectives of the agency. In addition, the CIO has a designated Performance Measurement and Reporting Official (PMRO) who is responsible for documenting if program managers are aligning their IT resources to the strategic goals outlined in the *Strategic IT Plan* and the *OPM's Strategic Plan*. The PMRO presents findings to the CIO and ACIOs on a regular basis and, if necessary, the CIO takes appropriate action to realign IT resources. The PMRO also provides progress reports to the Director regarding the action items on the Integrated Work Plan.

The CIO also uses reports produced by the Investment Management division to stay engaged with how IT resources are being utilized within OPM. For example, Investment Management submits the *Health of IT (HIT) Report* to the CIO and the IRB. The *HIT Report* rates all major investments red, yellow or green according to their performance and resource requirements. These reports allow the CIO and IRB to evaluate program managers and, if necessary, recommend to the Director that an investment be defunded or eliminated.

3.2 Visibility of IT planned expenditure reporting to CIO

The CIO's visibility into planned IT expenditures comes from a number of roles already discussed, including the CIO's membership on the CIC and IRB. This gives the CIO and other senior executives sufficient time to review and stop procurements that are outside the scope of the agency's business needs.

OPM is also making improvements to the IT contract approval process. As noted in section 2.4 of this document, the CIO and Office of Procurement Operations are working together to finalize the IT Acquisition Checklist, IT contract clauses, and guidance on how to use the contract clauses (D9, D10, Appendix C). Together, these artifacts will enable the CIO to have an even greater oversight over the IT resources in all program offices.

OPM anticipates that it will take substantial time to fully remediate all contracts for products and services in effect at OPM. As the new senior leaders engage with the program areas, we will continue to address concerns with existing contract services with IT components to incorporate the new IT clauses.

3.3 CIO defines IT processes and policies

Because there are many IT policies and procedures at OPM, the CIO has directed the creation of a policy reference model to mature our internal controls over policy development and implementation. CIO has created a charter for this model and is actively engaged in documenting the existing IT policies and processes throughout OPM, and identifying gaps in existing controls. To address FITARA, OPM is creating or updating the following policies:

- OPM System Development Life Cycle Policy and Standards
- Information Technology Baseline Management Policy

The CIO is the driving force behind the transition from waterfall development to the more flexible Agile methodology. The *Strategic IT Plan* emphasizes the need for development to be more adaptable to a changing environment. Consequently, Agile methodology is stressed throughout the document and is listed as a high priority goal. Over the last few years, the following investments have started using Agile development for their projects: USAJOBS, Multi-State Plan Program, USA Staffing Systems and others. In addition, the CIO has directed the program managers to incorporate Agile methodology into all initiatives being developed for the new Shell/IaaS environment.

Finally, in FY 2015, the CIO and ACIO of Strategy and Policy directed their staff to create processes for the Stage Gate Reviews and In Progress Reviews referenced above. As mentioned above, OCIO will formalize a process for the approval of the IT budget request with roles and responsibilities thoroughly described.

3.4 CIO role in program governance boards

The CIO has a prominent role in two program governance boards at OPM: the IRB and the CIC. For more information on these boards, see section 1.4.

4.0 ACQUISITION

4.1 Shared acquisition and procurement responsibilities

The CIO's oversight over acquisition will come from membership on the CIC (see section 1.4) and from new IT acquisition policies currently under development (see section 2.4).

OPM also monitors the management of IT contracts. In the future, OPM will reevaluate the IT PM certification procedure to improve training and emphasis on IT acquisition processes, and to encourage IT PMs to be FAITAS-certified level 2 or 3 Contracting Officer Representatives. The senior level IT PM positions recently filled in OCIO were all required to have this certification or to attain the certification within 12 months.

4.2 CIO Role in recommending modification, termination, or pause of IT projects or initiatives

The CIO plays an active role in determining which IT projects or initiatives should be modified or terminated, and makes these recommendations as a member of various governance boards discussed in section 1.4 of this document. These recommendations are informed by a number of reports already discussed, and by regular meetings with the IT Project Managers.

OPM is committed to continuous reevaluation and improvement of existing governance mechanisms, so in the future, the CIO will improve the process of analyzing underperforming investments. Under the new process, investments with a yellow CIO rating will be reviewed by the Executive Business Owner, the CIO, and the IRB to develop a performance improvement strategy. (D11, Appendix C) However, if the investment's performance continues to underperform, the CIO can lower the investment's rating and order that a TechStat be conducted on the investment.

4.3 CIO review and approval of acquisition strategy and acquisition plan

The CIO reviews and approves acquisition strategies and acquisition plans through the use of IPTs (see section 1.3). This mechanism was recently employed to govern the acquisition of the Enterprise Case Management System, bringing together Agency resources from the Office of General Counsel, the Office of Procurement Operations, CIO, and others. The CIO also uses OPM's Budget Prioritization Tool (see section 2.1) to align acquisitions to the agency's strategic goals.

While many IT acquisition strategies and plans are already in place at OPM, the CIO has two major improvements planned:

- OPM will create an official process and procedure on how to route significant
 modifications to contracts containing IT to the CIO or a designated representative
 (i.e., ACIO of Strategy and Policy) (D12, Appendix C)
- OPM will enhance the way Inter-Agency Agreements are managed by creating an official policy on how these contracts will be processed in the future. (D13, Appendix C)

4.4 CIO approval of reprogramming

OPM acknowledges the need of the CIO to be involved in reprogramming efforts and will create a process to formally document the CIO's role in all IT fund reprogramming (D14, Appendix C). Ultimately, OPM will create a thorough process that will require the CIO to approve the movements of all IT funds that would require Congressional notification. After the process is finalized, it will require approval by the CFO, Office of Procurement Operations, and CIC.

5.0 ORGANIZATION AND WORKFORCE

5.1 CIO approves new bureau CIO

OPM does not have any bureaus at this time, so this specific criterion does not apply to the agency. This may change with the implementation of the National Background Investigations Bureau, and we will amend this plan in the future, as appropriate. However, the CIO does have direct oversight over four ACIOs, who manage different subcomponents within OCIO.

5.2 CIO role in ongoing bureau CIO's evaluations

The CIO does not evaluate bureau CIOs at this time since no bureau has previously existed, but does evaluate the performance of the ACIOs. The CIO establishes the ACIO's performance goals and objectives and acts as the rating official during the annual reviews. This may change with the implementation of the National Background Investigations Bureau recently proposed by OPM, and we will amend this plan in the future, as appropriate.

5.3 Bureau IT Leadership Directory

The contact information of the CIO and ACIOs can be found in the Agency organizational chart (see Appendix A.8). This may change with the implementation of the National Background Investigations Bureau, and we will amend this plan in the future, as appropriate.

5.4 IT Workforce

Many competency requirements already exist for both non-supervisory and supervisory positions within OPM's IT workforce. When evaluating IT competencies OPM uses guidelines produced by the Administrative Policy and Information Management Division within the General Services Acquisition Regulation. These guidelines include published Certificates of Competency and Determinations of Responsibility.

OPM has been working on the acquisition human capital requirements, but additional work is required to define the necessary IT workforce competencies. Some of this work includes reviewing the competencies that are currently required for the Series 2210 positions. There are multiple steps needed to reevaluate the job competencies for Series 2210 positions and they are listed below:

- 1. Conduct an initial review of the competencies listed for Series 2210 positions within OPM. This includes an in-depth analysis of the hard and soft skillsets needed to perform the necessary functions of the job. (D15, Appendix C)
- 2. Meet with employees and Union representatives to discuss the findings from the competency analysis and request feedback and comments on the findings.
- 3. Incorporate feedback from employees and union representatives and where necessary and appropriate, update the Series 2210 competencies accordingly.
- 4. If necessary, update the Series 2210 Position Descriptions to reflect the requirements of the new competencies. (D16, Appendix C)
- 5. Follow procedures, consistent with agency policies and collective bargaining agreements, for updating employee PDs. Compare employee skillsets with the updated position competencies within the job descriptions and determine competency gaps.
- 6. Establish training plans to help employees gain the skills needed to close the competency gaps. (D17, Appendix C)

Although a significant undertaking, senior leadership continues to evaluate the skillset of employees in support of OPM's ability to maintain a workforce equipped to excel in a rapidly changing environment.

5.5 CIO Reports to agency head or deputy

At OPM the CIO reports directly to the Director of the agency. OPM's organizational chart can be found in Appendix A.8.

6.0 FITARA Common Baseline Implementation Approvals

The undersigned acknowledges that she has reviewed and concurs with OPM's *FITARA Common Baseline Implementation Plan*. Changes to this *FITARA Common Baseline Implementation Plan* will be coordinated and approved by the undersigned or her designated representative.

Signature:	Don't Col	Date: 3/10/2016
Print Name:	Dennis Coleman	
Title:	Acting Chief Operating Officer	
Signature:	aland A Op	Date: 3/8/2016
Print Name:	David Vargas	
Title:	Acting Chief Information Officer	

APPENDIX A: REFERENCES

The following table summarizes the documents referenced in this document.

Identifier	Document Name and Version	Description	Location
A.1	SDLC Flow. v1	OPM's SDLC Workflow Diagram	(link forthcoming)
A.2	Capital Investment Committee (CIC) Charter. v1	Description of roles and functions of the CIC	(link forthcoming)
A.3	Highway to Shell. v1	Diagram which shows the highway to shell.	(link forthcoming)
A.4	OPM System Development Life Cycle Policy and Standards	OPM's official SDLC policy	SDLC Policy
A.5	OPM Information Technology Baseline Management Policy	OPM official Baseline policy	IT Baseline Policy
A.6	OPM Strategic Plan FY2014-2018	OPM Strategic Plan FY2014-2018	OPM Strategic Plan
A.7	OPM Strategic IT Plan, February 2014	OPM Strategic IT Plan	OPM Strategic IT Plan
A.8	OPM's Organizational Chart	Chart depicting the organizational structure of OPM	Our People & Organization

APPENDIX B: ACRONYMS AND ABBREVIATIONS

CAO Chief Acquisition Officer
CFO Chief Financial Officer
CHCO Chief Human Capital Officer
CIO Chief Information Officer

CPIC Capital Planning and Investment Control
CPIGD Capital Planning and IT Governance Division

DLCC Detailed Life Cycle Cost

DME Development, Modernization, and Enhancement

EM Enterprise Management

FAC-PPM Federal Acquisition Certification - Program and Project Managers

FAI Federal Acquisition Institute

FDCCI Federal Data Center Consolidation Initiative

FITARA Federal Information Technology Acquisition Reform Act

FY Fiscal Year

GS General Schedule

IAS Integrated Acquisition System IDC Information Data Collection

IITGF Integrated Information Technology Governance Framework

IPT Integrated Project Team IRB Investment Review Board

IRM Information Resource Management

IT Information Technology
ITWP IT Workforce Planning
LCM Life Cycle Management
LOB Lines of Business

OA Operational Analysis

OCIO Office of the Chief Information Officer
OMB Office of Management and Budget
P/PM Program and Project Managers

PPBE Planning, Programming, Budget & Execution

SDLC System Development Life Cycle

SES Senior Executive Service

SF Standard Form

SME Subject Matter Expert

SPE Senior Procurement Executive SSI Strategic Sourcing Initiative

APPENDIX C: FITARA DELIVERABLES

D#	FITARA Reference	Deliverable	Deliverable Description
1	Budget Formulation & Planning: Visibility of IT Resources	FITARA Policy Memorandum	Policy Memorandum on the Implementation of the FITARA requirement for CIO visibility into IT spend
2	Budget Formulation & Planning: CIO Role in Pre-Budget Submission	In Progress Reviews	Document the In Progress Review (IPR) process and hold IPRs for the IT projects.
3	Budget Formulation & Planning: CIO Role in Pre-Budget Submission	Update IRB Charter	The IRB Charter will be updated to show a more defined alignment between the IRB and CIC.
4	Budget Formulation & Planning: CIO Role in Pre-Budget Submission	Annual Proposed IT Expenditures Survey	Develop an annual Proposed IT Expenditures survey that will be completed by the program managers as part of the pre-budget process to identify IT expenses.
5	Budget Formulation & Planning: CIO Role in Planning Program Management	Stage Gate Reviews	Document the Stage Gate Review process and start the on-going Stage Gate reviews for IT investments.
6	Budget Formulation & Planning: CIO Role in Budget Request	IT Acquisition Review Checklist	Develop an IT Acquisition Review checklist and accompanying guidance that clearly details the IT portion of the acquisition. The IT Acquisition Review checklist will list the types of IT expenses that will be included in the acquisition.
7	Budget Formulation & Planning: CIO Role in Budget Request	IT Budget Approval Process Flow	Develop a formalized process for the approval of the IT budget request with roles and responsibilities thoroughly described.
8	Budget Formulation & Planning: CIO Role in Budget Request	Affirmation Memorandum	Develop a memorandum that will be used as the official artifact verifying that the CFO and CIO concur on accuracy of the IT budget request
9	Budget Execution: Visibility of IT Planned Expenditure Reporting to CIO	IT Contract Clauses	Finalize the IT contract clauses with guidelines on when to use which clauses.
10	Budget Execution: Visibility of IT planned expenditure reporting to CIO	IT Acquisition Contract Guidance	Create contract guidance that will clearly detail the IT portions of any potential acquisition throughout the agency
11	Acquisition: CIO Role in recommending modification, termination, or pause of IT projects or initiatives	Oversight Process Before Termination	As an outcome to existing governance and oversight through IPRs and control gate reviews, document a process to modify, terminate or pause IT investments that includes IRB input.
12	Acquisition: CIO review and approval of acquisition strategy and acquisition plan	Contract Modification Procedure	Create an official process and procedure on how to route significant modifications to contracts containing IT to the CIO or a designated representative (i.e., ACIO of Strategy and Policy)

		I	
D#	FITARA Reference	Deliverable	Deliverable Description
13	Acquisition: CIO review and approval of acquisition strategy and acquisition plan	Inter-Agency Agreement (IAA) Contract Management Policy	Create a policy that will enable OPM to conduct improved IAA contract management
14	Acquisition: CIO approval of reprogramming	Process to Reprogram Funds	Document the process that ensures that the CIO will be involved in the approval of reprogramming the funds for IT resources in the Financial Management Manual.
15	Organization and Workforce: IT Workforce	Competency Requirements	Competency requirements will be developed to ensure OPM can anticipate and respond to changing mission requirements and maintain workforce skills in a rapidly developing IT environment.
16	Organization and Workforce: IT Workforce	Series 2210 Position Description Updates	Update position descriptions of 2210 Series employees, where competency gaps are evident.
17	Organization and Workforce: IT Workforce	Certification and Training Requirements	Develop and document requirements specifying the types of training and/or certifications required for Series 2210 personnel.



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