

DEPARTMENTAL REGULATION		Number: 3130-001
SUBJECT: Acquisition of IRM Resources	DATE: September 12, 1995	
	OOPI: Office of Information Resources Management, Agency Technical Services Division	

1 PURPOSE AND SCOPE

This regulation implements laws plus OMB and GSA regulations in describing how to plan, acquire, and use IRM resources to support USDA agencies' missions. It sets up a new information source, the Technical Approval Bulletin, to help in these activities. IRM resources include all products and services defined as "automatic data processing equipment" in the Brooks Act, PL 89-306 as amended. FIRMR 201 defines them as "FIP Resources."

The acquisition may be by any means. (See definition of "acquisition" in Appendix A.) This includes inter- and intra-agency and cooperative agreements, in-house software development, and procurements. Agencies must have Technical Approval (TA) before acquiring IRM resources or beginning use of them. Federal employees involved in IRM work are part of an agency's IRM resource. A Departmental TA is needed if planned acquisition costs (including Government employee costs) exceed certain thresholds.

TA from OIRM is independent of and required before procurement approvals from OO and GSA. It is independent of OGC's legal review of acquisition documents and OAE, OSDBU small business approval. But, the Parallel Review Process (See DR-3130-4) helps obtain all these approvals.

The IRM planning process and TA are connected. TA is the immediate follow-on step after proposing a new acquisition initiative in a plan. OIRM grants TA based on planning and study information, technical factors as well as evidence of an agency's management and operational ability to execute the acquisition and implement the system.

2 SPECIAL INSTRUCTIONS AND CANCELLATIONS

a This regulation supersedes DR 3130-1, Technical Approval for IRM Products and Services, May 28, 1985.

b All requests for communication products and services are also subject to DR 3300-1, Telecommunications.

c Each agency shall make and maintain a directive for handling TA requests internally. It shall be consistent with this directive and DR 3130-4, Parallel Review Process and Trail Boss Program, as they apply to the agency. Each agency shall submit one copy of its revision to OIRM/ATSD within 180 days of the date of this directive.

d This regulation operates in concert with DR 3130-4, Parallel Review Process and Trail Boss Program.

e An agency shall comply with and report on TA and DPA conditions and requirements and shall report contract award and accomplishments on them as noted in Section 14, Monitoring Technical Approvals. This applies retroactively to all existing acquired systems with life continuing on the date of this regulation.

f The Technical Approval Bulletin (TAB) is established to assist IRM acquisitions. This is a multimedia information service. The information provided will cover such topics as benefit cost analysis, requirements analysis, analysis of alternatives, forms, configuration management, value engineering, etc. The information may be provided in document, electronic message, electronic bulletin board, and reference library forms. To get on the distribution list, a person or organization submits their names, agency and subunit, mailing addresses, phone and FAX numbers, and electronic mail addresses (on the Departmental backbone system) to TAB, OIRM, ATSD, Rm 425-W, Administration Building by mail, or to OIRM.ATSD by Email, or to 447-3456 by phone.

3 BACKGROUND

The Brooks Act (PL 89-306) of 1965 began procurement procedures for it automatic data processing equipment." The law and GSA defined this term as ADP equipment, ADP service (time sharing and batch processing), ADP equipment maintenance, software packages, and ADP support services. The Paperwork Reduction Reauthorization Act (PL 99-500, 99-591) redefined this term. It now covers most forms of communications including voice and data. IRM resources include everything in "automatic data processing equipment" or Federal Information Processing, FIP, resources as defined in the FIRMR.

Other laws bear on acquisitions of computers and communications products and services. They are: The Paperwork Reduction Act (PL 96-511), Competition in Contracting Act (PL 98-369), Computer Security Act (PL 100-235), Small Business Act as amended, plus others.

There are four main approvals needed before obtaining IRM resources when Departmental thresholds are exceeded. Each has a separate set of thresholds and the basis for each is fundamentally different. First, OIRM must grant a TA for systems, their management and use for servicing mission related information and operational needs. Key to this are life cycle planning, life cycle cost, and acquisition cost.

Second, FIP resources must have procurement approval by OO and sometimes GSA. These are Delegations of Procurement Authority (DPA). They look at the needs of the FIP resource procurement process, including the solicitation document, staff experience in contracting for the resources, system life cost, and annual cost. Third, OAE, OSDBU

must concur in socioeconomic considerations by looking at small business implications. Lastly, these procurements must have OGC's approval for legal sufficiency by considering funding authorities and legalities of the solicitation document.

Each approval may enable different courses of action. A TA and DPA may be for different amounts of time and money. But, GSA requires USDA approval (both technical and procurement) before it considers proposed acquisitions.

With these differences, there may be confusion. It is important to sort out the limitations and freedoms of each. The Parallel Review Process helps you do this task (see DR 3130-4).

4 POLICY

a Agencies shall acquire and use IRM resources that embody open systems and comply with the Applications Portability Profile, and USDA standards for portability to and, where needed, interoperability with other such resources in USDA. (See DR 3120-1, IRM Standards.) Also, provision shall be made in contracts, agreements and use of IRM resources to allow compliance with new or revised standards as the standards evolve over the life cycle.

b An agency shall propose an alternative for acquisition and use of IRM resources to meet its information needs for effective and efficient mission accomplishment. The alternative shall be a refinement of the approved agency IRM Plan and OMB A-11 report. It shall support the USDA Business Plan and the IRM Strategic Plan. The chosen alternative shall be selected from a broad set of innovative alternatives that encourage competition and shall be the most advantageous alternative. The system design concept of the proposed acquisition shall implement an information architecture that: reduces paper work, data collection burden, and record keeping; increases customer access to data; improves integration and accessibility to data bases; facilitates sharing of data among Departmental agencies, and provides for system security. An agency shall define the system life to cover the longest reasonable time based on the expected life of the information, FIP resource technology, and nature and stability of mission requirements. System life may be independent of the length of any contract and may encompass multiple contract periods.

c Major acquisitions of IRM resources shall have the commitment of and continued attention by senior agency officials including the managers of the program or functional areas that will use the proposed system. Any manager of an acquisition shall have enough stature and experience to administer resources and conduct an effective and efficient approvals process. This official also must be able to manage the acquisition. The manager's authority and responsibility shall predominate except as affected by legal and procurement requirements. The manager should invite counsel from OGC and the contracting officer in all decisions, but procurement related decisions are the responsibility of the contracting officer. Key decisions shall be handled as outlined in OMB Circular A-109, Major System Acquisitions and related pamphlets.

d An agency shall include, in designated major acquisitions, the option for other USDA units and cooperators to buy from the resulting contract. OIRM shall make the designation upon coordination with the acquiring agency and Departmental Administration. The acquiring unit shall administer other agencies' use of the contract.

e Acquisition planning shall be long term and comprehensive, but procurements should be modular, phased or evolutionary. The Department supports full and open competition in the procurement of FIP resources. It also supports the Federal Government's commitment to small, minority and women-owned businesses. Such firms are to be encouraged to participate in the procurement process whenever feasible through "set-asides," subcontracting plans and other incentives.

f An agency shall consider persons with disabilities in IRM resource analyses and plans. These persons may include employees, contract personnel and cooperator staff who may use, develop, maintain, or operate a proposed system. The needs of persons with disabilities shall be assessed in the requirements analysis, benefit cost analysis and analysis of alternatives.

Also, agencies shall formulate and document a strategy for acquisition of features to allow accessibility and performance by such staff regardless of the number of persons with disabilities that may have to be accommodated currently. This strategy shall be followed in the acquisition documents, in the acquisition and in system implementation and use (see FIRMR, section 201-30.007, and Bulletins 56 and 63).

g Appropriate IRM security shall be incorporated in all IRM resource planning, acquisitions, and use. This security shall, to the extent needed, protect information, provide for continuity of operations, protect resource investment, provide for emergency preparedness, and protect national security. IRM security needs shall be assessed for all IRM acquisitions through a risk analysis or a security review. This assessment shall cover all IRM resources. Safeguards that are acquired or developed in-house, as a result, shall be established consistent with DR 3140-1 and DM 3140-1.

h An agency shall obtain Departmental TA before acquiring any IRM resource if any Departmental TA threshold may be exceeded in the life cycle. A TA shall cover ALL agency headquarters and field unit costs for an entire system plus its equipment, software, and service upgrades and additions to it over a life cycle. Also, agencies shall obtain a Departmental TA if a DPA from GSA is needed. TA shows approval of specific items (see Section 12, Technical Approval).

(1) An agency shall combine acquisitions of IRM resources from the same category (see Section 13, TA Delegation and Threshold Levels) or from multiple categories for a system. Agencies shall not split acquisitions to avoid exceeding TA or DPA thresholds. Also, this policy covers all acquisitions of the same or similar items described in the approved agency IRM Plan and OMB Circular A-11 reports.

(2) An agency may need a TA before doing the testing noted in Paragraph 11 d(2) below. If the total cost of the system to be acquired plus items needed for testing exceeds any Departmental threshold, a TA is needed from OIRM before ANY acquisition is made. Acquisitions under the regulatory or agency specific delegation levels are not permitted for obtaining IRM resources used for testing in this case.

(3) Agencies shall carry out complete life cycle planning to eliminate the need for an amended TA due to inadequate identification of requirements. Agencies shall make every effort to anticipate changes in program or administrative functions that would affect the quantity or features of systems components over the system life. OIRM will consider an agency's request to amend a current TA when a new requirement arises from a source external to the agency. Poor planning is insufficient justification for an amended TA. Most amendments will require a new competitive procurement for acquisition of FIP resources to meet the new requirement.

(4) A Departmental TA is not required for acquisitions not subject to the Brooks Act, as amended. Refer to FIRMR 201-2.001, DEFINITIONS and 201-1.103, APPLICABILITY for more information. Nevertheless, all agency acquisitions of FIP resources should be documented completely since the GSBCA has authority to hear a protest in any case involving FIP resources.

i Agencies are encouraged to obtain the highest possible TA threshold under the principle of "earned autonomy" consistent with their needs and management capabilities. Refer to DR 3130-3 for information on TA thresholds. OIRM may temporarily reduce an agency's TA thresholds to stimulate management improvement when required.

5 ABBREVIATIONS

- ADP - Automatic Data Processing
- ADPE - Automatic Data Processing Equipment
- AGAR - Agriculture Acquisition Regulation
- APR - Agency Procurement Request
- ART - Acquisition Review Team
- ATSD - Agency Technical Services Division, OIRM

BCA - Benefit Cost Analysis
 CBD - Commerce Business Daily
 DA - Departmental Administration
 DPA - Delegation of Procurement
 Authority
 DR - Departmental Regulation
 FAR - Federal Acquisition Regulation
 FIP - Federal Information Processing
 FIPS PUBS - Federal Information
 Processing Standards Publications
 FIRMR- Federal Information Resource Management
 Regulation, GSA
 GSA - General Services Administration
 GSBCA- General Services Board of Contract
 Appeals
 IRM - Information Resources
 Management
 LTD - Live Test Demonstration
 OAE - Office of Advocacy and Enterprise
 OGC - Office of the General Counsel
 OIRM - Office of Information Resources
 Management
 OMB - Office of Management and Budget
 00 - Office of Operations
 OSDBU- Office of Small and Disadvantaged
 Business
 Utilization
 PL - Public Law
 RFC - Request for Comment

RFI	-	Request for Information
SES	-	Senior Executive Service
TA	-	Technical Approval
TAB	-	Technical Approval Bulletin

6 FORMS

a Form AD-834, IRM Technical Approval Request Certification (See Figure 1). This is used to certify requirements in requesting TA or an amendment to one. It is signed by the agency's Deputy Administrator for Management when a Departmental TA threshold is exceeded. The original is submitted to OIRM.

b Form AD-835, IRM System and Service Security Certification (See Figure 2). It is used to certify analyses, requirements, and safeguards relating to a system's security and privacy aspects. It is signed by the agency's Deputy Administrator for Management when a Departmental TA threshold is exceeded. The original is submitted to OIRM.

7 DEFINITIONS

See Appendix A, Definitions.

8 REFERENCES

See Appendix B, References.

9 RESPONSIBILITIES

a The USDA Senior Official for Information Resources Management, as required by OMB Circular A-130, is the Assistant Secretary for Administration, who is responsible for carrying out all aspects of the Paperwork Reduction Act (44 U.S.C. 3506(b)) as described in that Circular. This includes administering the authority to procure resources subject to the Brooks Act as delegated by the General Services Administration.

b The Director of the Office of Information Resources Management shall be the executive agent for the designated Senior Official. He or she is responsible for carrying out IRM activities of the Paperwork Reduction Act and shall coordinate with the Director of the Office of Operations in IRM procurements. The Director, OIRM, administers the Parallel Review Process.

c Each agency shall designate a Senior IRM Official. This person is responsible for implementing and executing all aspects of the Paperwork Reduction Act within the agency, including this directive.

d The manager of an acquisition is responsible for coordinating programmatic, technical and contracting functions when acquiring IRM resources. He or she is responsible for following all laws, regulations and processes relating to IRM acquisitions, including this directive, OMB Circular A-109 and related documents, the FAR, and FIRMR.

e The Source Selection Authority for procurements is described in AGAR 415.612.

f All officials involved in acquisitions must safeguard procurement information from unauthorized disclosure. This information is designated as "PROCUREMENT SENSITIVE" by the contracting officer. The information includes: all acquisition and life cycle costs, information provided for or designated for the Acquisition Review Team (ART), and information discussed in Parallel Review meetings. All questions from sources outside the Department, outside the ART staff, and outside ART staff management must be referred to the contracting officer. All officials involved in acquisitions must have signed a Procurement Integrity Certification.

g OIRM, ATSD manages and operates the Parallel Review Process in cooperation with other Departmental staff offices and USDA agencies.

h Agencies communicate with GSA on acquisition related topics through OIRM and 00.

10 PARALLEL REVIEW PROCESS

For orderly acquisition of IRM resources, DR 3130-4, Parallel Review Process and Trail Boss Program, defines the activities in systems acquisition and implementation. For major acquisitions, refer to OMB Circular A-109 for additional guidance.

a The Parallel Review Process activities.

(1) Initiate and form an ART. An agency should request OIRM to set up an ART within six months of a major new initiative appearing in the approved agency IRM Plan or in OMB Circular A-11 reports, exhibits 43 A and B, or formulated between these cycles, whichever occurs first.

(2) Review Concepts and Strategy, First review.

(3) Agency Plans and Completes Needed Studies.

(4) Review Plans and Studies, Second Review.

(5) Agency Develops Specifications.

(6) Final Review and Approval, Third Review.

(7) Acquisition Actions.

b Parallel Review Process Follow-on Activities, Implementation and System Use.

(1) Acceptance testing and completion of the configuration management plan.

(2) Conversion training and start-up activities.

(3) Operation of system and configuration management.

(4) Monitoring achievement of acquisition goals, including periodic reporting.

11 INFORMATION REQUIREMENTS AND DOCUMENTS

a Information Requirements

(1) System Life. The system life is the authorized time the approved resources can be used to meet mission information requirements. It includes the time for all maintenance services on the resource and the time until a replacement resource is fully implemented.

The system life must be the longest supportable time for beneficial use of an IRM resource. System life is affected by such factors as functions to be done; time and cost to implement new resources; new capabilities and the generally improved price performance of changing technology; and defined and probable workload. At the end of a system life, the product or service may not be used without an amended or new TA and DPA.

(2) Data Rights. Data rights are defined in FAR 27 and 52. The specific needs for and time to define data rights become available in information needs, assessment requirements analysis software definition, and specification writing. Agencies are to determine what data rights the Government needs from the technical standpoint so that contractor rights are protected and they have incentives to commercialize the results of Government funding. This determination is essential for the contracting officer who is responsible for contractual decisions in this area. It is done in cooperation with the contracting officer and legal counsel.

(3) Information Identification. Information needs drive an acquisition. They are determined

through an information analysis and an information architecture which serve as the foundation for functional requirements. Each acquisition must support at least a subset of an information architecture and may require further refinement of it for that acquisition. A specific or separate architecture need not be created for each acquisition provided an existing architecture is supported by a proposed acquisition. An agency information architecture must be congruent with the Departmental architecture, but it may be more detailed.

b General Considerations for Documents

(1) Key Documents. The key documents in acquisition approval are the Form AD-834, the TA, the APR, and the DPA. The Form AD-834 and the APR plus the values and information contained in them usually change as the approval process proceeds. They are put in final form for the third review (Activity 6).

(2) Document Security. All procurement documents shall have proper protection. Identify them as "PROCUREMENT SENSITIVE." Copying of these documents shall be controlled. Parallel Review staff shall follow all procurement regulations and laws governing ethics and information disclosure.

(3) Documentation Amount and Detail. The detail and amount of documentation depend upon the size, complexity and stage of development of the acquisition. Use only the MINIMUM to describe the acquisition to an unfamiliar, but technically competent, audience. In the Trail Boss Program and other large acquisitions, document in ever more detail as the process goes through implementation.

(4) Order of Analysis and Document Development. There are six general phases during which analysis, document development, and operations take place. The phases and order of execution are: Requirements Analysis, Analysis of Alternatives, Solicitation Preparation, Approval Processing, Acquisition Actions, Implementation and System Use. The documents for each and their relation with activities in the Parallel Review Process are shown below.

c Requirements Analysis

Within the requirements analysis, the key information is analyzed first followed by development of an information architecture, or, if one

already exists, a refinement or a correlation of it with the proposed acquisition. These items are the basis for the functional analysis and are input to the functional requirements document. See the GSA publication "Requirements Analysis and Analysis of Alternatives," FIRMR 201 and the TAB for more guidance. The system design concept is identified using all available information.

(1) Information Needs, Activity 3

Analyze the managers' and end-users' information needs considering essential or critical records and cross-agency information needs. The information analysis should focus on these topics:

(a) Reducing paperwork and record keeping requirements plus burden of data collection.

(b) Providing managers and end users with ready access to needed data in a useable form.

(c) Improving integration of and accessibility to data bases and sharing of data among Departmental agencies.

(2) Information Architecture, Activity 3.

Information needs are further defined by creating an effective information architecture to meet mission requirements. Information needs and mission requirements are independent of any particular system or technological solution. They should be based on and reconciled with overall agency capabilities, priorities, and resources plus legislative, operational, and management requirements.

If no information architecture exists that covers the proposed acquisition and the need for the proposed IRM resources is immediate, it may be developed later. But, it must be developed within one year from ACTIVITY 2 in the Parallel Review Process. A schedule will be proposed for its development. If an architecture exists, submit documents describing how the architecture relates to the proposed acquisition. The architecture may be refined for better correlation.

If an architecture is to serve a part of an agency, it must be compatible with and supportive of the agency and Departmental architectures. It is dependent on many factors and is described by attributes of information in a system, including:

- (a) Information sources, creation, and flow (including volume, velocity, and the topology).
- (b) Users.
- (c) Carrier vehicles (LAN, MAN, WAN, disks, paper, forms, microfilm, etc.).
- (d) Time relationships.
- (e) Sensitivity plus protection requirements.
- (f) Interfaces to external systems.
- (g) Transformations, storage attributes and disposition requirements.
- (h) Implementation tools (including software packages, computers and networks) necessary to process and administer the information.
- (i) The rules, laws and procedures for managing information.

These factors are affected by the organizational culture, employee skills and training needs plus external mandates (Congressional, executive, or judicial direction). A model of an architecture may be displayed in graphical form.

(3) Functional Analysis, Activity 3

Perform an analysis of program and administrative functions to be served by the proposed system. This must be as specific as necessary to describe how information needs to be used. This analysis must correlate with the information architecture. The analysis is the foundation for the definition of the proposed system requirements in functional terms. Functional requirements in a solicitation enhance full and open competition by giving prospective vendors latitude in the choice of technical solutions.

(4) Functional Requirements, Activity 3

(a) Define functional requirements in terms of number and kinds of jobs to be done, their general operations, and security needs. Include the workload characteristics and volumes on an annual basis or shorter time frame.

(b) The workload defined in determining requirements must cover all reasonably expected mission needs over the system life period. Where there has been a history of new legislative, judicial or other actions which have increased the workload, estimates for this workload and its processing resource requirements must be included. Likewise, if increments are possible in the future that have not happened in the past, estimates of these resource requirements must be included.

Both these estimates must be based on fact and reasonable expectation. Estimates must be adequate enough to minimize restricted procurements during the system life. Compatibility limited and sole source buys are examples of restricted procurements. However, there are circumstances where these kinds of buys are valid ways to obtain needed resources.

(c) New software traditionally makes increasing demands on equipment performance and storage capabilities. Advances in information use make increasing demands too on equipment and communication facilities. Include communication requirements of traffic volumes, characteristics, routing, security, etc. (See DR 3300-1).

(d) The experience and training of agency technical and contract personnel are described.

(e) The requirements of OMB Circular A-109 also should be

considered also for major acquisitions.

(f) Software definition begins with conceptual design of the major applications for the system. This may be done by in-house resources and/or by contract. This includes defining: the kinds of data base management systems (network, relational, object-oriented, etc.); the types of software to handle computational or statistical work; the implementation of safeguards identified in the risk analysis; and office processing. Office processing includes spreadsheet, project management, and communications applications plus, word, graphics and image processing.

Software definition DOES NOT always include detailed descriptions of software programs as outlined in the FIPS PUBS. The definition may be at a higher level consistent with the stage of development of the system. However, the definition must implement all applicable standards, including SQL, POSIX, GOSIP and other standards related to the Application Portability Profile.

The software and its upgrades or replacements must be estimated throughout the system life. A configuration management plan is required for control. It shows how and when software is changed. This plan may evolve through the acquisition process. It must be in final form and submitted to OIRM no later than 60 calendar days after contract award.

(g) Equipment and service requirements, including telecommunications, are defined after the information, architecture, functional requirements, and general software needs are set. Software needs and workload drive equipment and service

requirements. Alternative applications of equipment (and telecommunications) technology should be considered. Adequate telecommunications facilities and effective modes of operation are crucial to good solutions. These assessments are essential for estimating costs, both acquisition and related costs.

The equipment and service plus their upgrades or replacements must be estimated throughout the system life. A configuration management plan is required for control. It shows how and when equipment or service is changed. This plan may evolve through the acquisition process. It must be in final form and submitted to OIRM no later than 60 calendar days after contract award.

d Analysis of Alternatives

(1) Alternatives, Activity 3. Create several innovative, viable alternatives for meeting the functional requirements including security. The alternatives may be developed from three assessments: functional requirements, Government and contractor resource availability, and acquisition method. A proposed life cycle schedule is required for each alternative. It must show major acquisition milestones, completion of implementation, and major milestones during operation including the date the recompetition approval process will begin. See the TAB, Analysis of Alternatives for suggestions of the acquisition milestones. The emphasis for major acquisitions should be to generate innovative competition from industry. The analysis of alternatives is completed after testing is finished (see item (2) below).

The alternatives should be contrasted against a baseline alternative, usually the status quo. All should be analyzed to find the one that is most advantageous to the Government. The preferred alternative, when implemented, will become the new baseline against which future measurements are made.

(2) Testing, Activity 3. The agency develops test plans and acquires needed IRM resources to evaluate or validate: (1) possible ways of meeting functional requirements; (2) security requirements

and safeguards; (3) validity of alternatives and system design concept by verifying software, equipment, service, and telecommunications needs; and (4) advantages of alternatives. The tests are then done. This testing could include appropriate prototype or pilot testing or other evaluations.

OIRM encourages such testing to validate use of technology, competitiveness of requirements, and integration of technology with people, operations and agency philosophy. Acquisition of resources for this testing must be done on a competitive basis. Software applications should be prototyped before obtaining production equipment to insure the agency obtains adequate computer capacity. Also, test the communications capacity, data interchange ability, and equipment configuration. But, the agency must insure that such testing and resulting requirements SHALL IN NO WAY INFLUENCE any follow-on acquisition to reduce the competitiveness of that acquisition. Testing shall not establish the need for sole source or compatibility limited procurements.

(3) Life Cycle Schedule, Activity 3. This

includes major milestones in the approval process, the acquisition phase, the implementation and use phase, and recompetition for replacement resources. The alternative that is most advantageous to the Government should have a detailed schedule.

(4) Risk Analysis or Assessment, Activity 3. See DR 3140-1 and related manuals for guidance on this activity and documentation. This is required to analyze and justify security requirements and safeguards. An evaluation is not required for every acquisition. However, deficiencies found in prior analyses should be corrected in the proposed acquisition.

(5) Conversion Study, Activity 3. It is important to consider the agency's investment in FIP resources that may have to be converted, replaced, or disposed of as a result of the selected alternative. Analyze the cost, risk, and magnitude of conversion from installed FIP resources. This study shall be commensurate with the size, complexity and stage of development of the acquisition. No study is needed where FIP resources don't exist, peripherals only are being acquired, and FIP resources currently under lease are being purchased. See FIRMR 201-30.012-2 for additional details. The results of this analysis are incorporated into the benefit cost analysis.

(6) Benefit Cost Analysis, Activity 3. Use the USDA BCA template for costs plus tangible and comparative benefits. Refer to the TAB and follow one of the methods for intangible benefits analysis. This analysis must evaluate various scenarios for equipment maintenance over the system life. This template implements FIRMR 201, FIPS PUB 64, OMB Circular A-94 and A-109. OMB Circular A-76 and related documents for it and A-109 and A-130 also should be followed. Contact OIRM, ATSD for help in conducting benefit cost analyses.

Use the full BCA method, including both tangible and intangible benefits, for the OMB Circular A-11 Report benefit cost analysis. This analysis also will serve as the Independent Government Cost Estimate called for in FAR 4, although it may have to be updated for the final review (Activity 6) or later as the contracting officer desires. It serves as the baseline for contrasting alternative ways of meeting mission requirements.

(7) Telecommunications Analysis. Use of the FTS 2000 services and GSA's Consolidated Local Telecommunications Services Program are described. Any proposed use of services outside the GSA and USDA mandatory programs must be justified.

e Solicitation Preparation

(1) Set Aside and Subcontracting, Activities 3-5. Define options for small and minority business set aside and subcontracting opportunities.

(2) Configuration Management Plan, Activity 5. Draft the configuration management plan, considering equipment, software, and services. This shows the management controls and scheduling for changes made to equipment, software and services over the system life. It is submitted in draft form for Activity 6.

(3) RFI or RFC, Activities 3-5. Issue an RFC or an RFI. OIRM recommends that at least one of these be issued to communicate with industry, to increase competition, and to help identify alternatives. (See DR 5034-1.)

(4) Agency RFI or RFC Responses, Activities 3-5. Agency evaluation of vendor responses to RFC's and RFI'S. These are submitted to OIRM when completed.

(5) Other Documents as Needed.

(a) Justification for compatibility limited purchase, Activity 5.

(b) Justification for other than full and open competition, Activity 5.

(6) Specifications, Activity 5. This is a statement of work, solicitation document or other acquisition vehicle. Specific clause(s) are required on applicable standards that implement policy stated in Section 4a. Other standards may be included by reference. Members of the ART review at least one draft of this document. They will review Solicitation Sections B, C, E, F, L, and M as a minimum. The final version of the solicitation document is reviewed by the ART in the final review stage (Activity 6) prior to being released to industry.

(7) LTD, Benchmark, or Other Operational Evaluation, Activity 5. The LTD plan shows how the tests will be conducted, what is to be tested, and how the tests are to be run and evaluated. The plan must be available for Activity 6 along with a draft of the LTD specifications.

f Approval Processing. Upon review in ACTIVITY 6 of all plans and documents, the official approval processing is conducted. This results in a TA and DPA for the agency.

g Acquisition Actions.

(1) Periodic Reports, Follow On A Periodic or specific reports are developed and submitted as noted in the TA memorandum or as noted in Section 14, Monitoring Technical Approvals.

(2) Contract Award Notification, Follow On Activity. An agency shall report on contract award. Each applicable TA includes a report form-letter showing the information to submit (See Figure 3). These are due to OIRM and OO, Procurement Division, 20 calendar days after contract award.

h Implementation and System Use.

(1) Periodic Reports, Follow On Ac Periodic or specific reports are developed and submitted as noted in the TA memorandum or as noted in Section 14, Monitoring Technical Approvals.

(2) Configuration Management Plan, Follow On Activity. This is completed, usually, within 60 days

after contract award. A copy is sent to OIRM upon completion.

12 TECHNICAL APPROVAL

a Departmental TA. DR-3130-4, Parallel Review Process and Trail Boss Program, describes the process for obtaining TA. OIRM analyzes Departmental TA requests and bases approval on the available information and certification on the forms AD-834 and AD-835. Granting of a TA constitutes OIRM's concurrence with the agency's proposal for system acquisition that it is the most advantageous alternative. TA includes specific approval for:

(###)

- (1) Concepts and strategy of the proposed acquisition. This includes the requirements analysis for meeting the agency information and operational needs over a proposed life cycle. Also approved are the information architecture relative to the proposed acquisition, the overall system design concept, the life cycle, the system life and the proper use of IRM technology.
- (2) Congruence of the acquisition with agency long range plans, OMB Circular A-11 reports, Departmental IRM strategic plans, and the life cycle schedule. OIRM approves the congruence between requirements, costs and acquisition specifications.
- (3) Adherence and plans for adherence to Departmental and Federal regulations and standards including those for portability, interoperability, and accessibility. This also includes providing the minimum complete documentation. The minimum is consistent with the size, complexity and stage of development of the acquisition.
- (4) The analysis of alternatives and benefit-cost analysis. This includes the form AD-834 acquisition cost and its subcategories plus the life cycle cost derived in the benefit cost analysis. Analyses must be complete and consistent with the size, complexity and stage of system development. Costs must reflect best and complete estimates of all major planned or likely events and conditions in the life cycle. This includes the acquisition, related, and non-IRM costs. Benefits must be realistic and complete.
- (5) Qualifications and number of the management and technical staff proposed for the acquisition, implementation and system operation. This includes, where appropriate, a Trail Boss, his or her immediate staff and reporting structure, the

charter and the APR. The Trail Boss approval is subject to the person following DR 3130-4, and the FIRMR.

b TA Amendment. An agency requests and amendment to an existing TA whenever there is a material change to the information provided in the original TA request. Material changes include changes in such items as system life; acquisition method, type or timing; costs or benefits by more than ten percent; technical requirements of large or important parts of the system, including primary information needs and sensitivity; and new use of the IRM resources by larger groups of people such as USDA employees or the public. Also, planned contract modifications that make available new technology, increase quantity or permit other significant changes need a TA amendment.

The change must be supported by documentation describing how actions by Congress, the judicial system, the Executive Office of the President or Departmental top management mandate the need for additional resources. Carefully describe the timing of the mandate or the potential for it and the evidence of resource needs. The agency must request the amendment before the change occurs.

Consult with OIRM before reviving the Parallel Review Process for a possible amendment. To prepare and submit a request for amending an approved TA, follow the instructions in DR 3130-4 for initiating a new parallel review process. Depending on the complexity of the amendment, fewer ART meetings may be possible.

13 TA DELEGATION AND THRESHOLD LEVELS

See DN 3130-2, Technical Approval Delegations for Application Information Systems.

14 MONITORING TECHNICAL APPROVALS

OIRM will monitor agency compliance with acquisitions and follow-on requirements. This includes TA conditions, technical conditions in the GSA DPA, contract award, system implementation and use. OIRM will monitor the implementation of agency directives that implement this regulation.

a Conditions. An agency shall comply with TA and DPA conditions and requirements. Reports of accomplishments shall be made to OIRM as specified in the TA. Annual reports shall be submitted by December 1 of each calendar year of contract life, including the final year. Describe any deviations from the Ta or DPA. This applies retroactively to all existing conditions on all acquisition with a system life continuing on the date of this regulation.

b Contract Award. An agency shall report on contract award. Each applicable TA includes a report form-letter showing the

information to submit (See Figure 3). these are due to OIRM 20 calendar days after contract award.

c System Life Responsibilities. Agencies are responsible for all actions after the TA, including tracking expenditures against the TA and DPA values. An agency shall accurately document actions taken on approved projects and maintain those records for the life cycle. Documentation shall be maintained for at least one year after the end of the system life (procurement documents are retained for 6 years after the contract has ended).

d OIRM Reviews. A TA case may be the subject of a review at any time during the system life as part of OIRM's on-going review program. Such a review may include, but not be limited to, compliance with TA conditions, process and outcome of any acquisitions, benefits achieved, and general system operation. The review program will meet the requirements of OMB Circular A-109, Major System Acquisitions and applicable FIRMR requirements.

e Non-compliance. Failure to comply with conditions, certifications, or regulations relating to an acquisition suspends the Application Information System Specific TA. Such failure may inhibit other TA requests in process and may lead to a reduction in delegated Ta thresholds.

15 INQUIRIES

For detailed information on TA for IRM acquisitions, contact the Agency Technical Services Division, OIRM at 202-720-3456. ### 9/12/95)

Signed by:

John L. Okay

CONTACT OIRM, IMD ON 202-720-8799 OR FAX 202-205-2831 FOR THE PAPER COPY OF THE FOLLOWING IMAGES: FIGURE 1, IRM TA REQUEST CERTIFICATION; FIGURE 2, IRM SYSTEM AND SERVICE SECURITY CERTIFICATION; and FIGURE 3, CONTRACT AWARD NOTIFICATION.

APPENDIX A

DEFINITIONS

1 Acquire or Acquisition. Bringing into agency inventory an IRM resource by any means. This includes purchase, lease, inter-agency or intra-agency transfer, and cooperative agreement for IRM resources; in-house development, maintenance and conversion of software; and in-house use of other FIP resources. Resources may be used by the Government, a contractor, or a cooperator. An acquisition begins when an agency either establishes agency needs in the functional analysis in the requirements analysis document, or makes a request to form an Acquisition Review Team, which ever occurs first.

2 Acquisition Cost. Total expected cost of an IRM resource over a life cycle. This includes studies, pilot or prototype testing, consultants, and other actions taken to obtain the resource before the system life begins. It covers costs of resources needed to meet functional requirements over the system life. It includes such items as: site preparation (construction, facilities equipment, etc.); other costs associated with acquisition-related contracts; software developed, maintained and converted by Government employees, contractors or cooperators; cost of FIP service at USDA or other computer facilities; and telecommunications costs on FTS2000 or other networks. The costs are broken into 5 categories: FIP equipment, FIP services, FIP software, Support Services, and FIP related supplies.

3 Acquisition Review Team. A group formed by OIRM to facilitate acquisition of IRM resources in the Parallel Review Process. It is made up of agency staff, oversight personnel from Departmental staff offices, and GSA representatives. It is led by a manager from the requesting agency. The group approves steps within the Parallel Review Process and recommends approval of the acquisition.

4 Agency. Any USDA operating entity, including agency, cooperator, Government corporation, information technology facility, and Departmental staff offices.

5 Automatic Data Processing Equipment. Any equipment or interconnected system or subsystems of equipment used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching interchange, transmission, or reception, of data or information:

(a) by a Federal agency, or

(b) under a contract with a Federal agency which:

(1) requires the use of such equipment, or

(2) requires the performance of a service or the furnishing of a product which is performed or produced making significant use of such equipment.

Automatic Data Processing Equipment includes:

(a) computers,

(b) ancillary equipment;

(c) software, firmware, and similar procedures;

(d) services, including support services;

(e) related resources as defined by regulations issued by the Administrator for General Services; and

(f) special purpose computers and other devices not specially designed.

This does not apply to:

(a) automatic data processing equipment acquired by a Federal contractor which is incidental to the performance of a Federal contract; and

(b) radar, sonar, radio, or television equipment.

6 Benefit Cost Analysis. A compilation and analysis of estimated (and as time progresses, actual) costs and benefits of an IRM system over its life cycle. Benefits may be tangible or intangible. Tangible benefits are measured in dollars. Costs and tangible benefits are discounted using OMB Circular A-94 rates. These benefits are then divided by the discounted costs to yield a benefit-cost ratio. Other measures of a project's or an alternative's worth also come from the analysis. Refer to the TAB for specific procedures and templates to use.

7 Configuration Management (CM). The bridge between the management and control of processes and products. The processes may involve both software and equipment design, selection, development, and implementation. The products are software packages and equipment used. CM provides control over all components of a system by providing a description of how processes and products are to be changed during the system life and a schedule by which they will be changed. Elements in CM include requirements specification, change control, task assignment, tracking, review, and conformance to standards.

8 Contract. For the purposes of this DR, this term goes beyond the definition in FAR. It includes agreements with commercial firms; cooperative agreements with colleges, universities, or other qualified organizations; and interagency agreements. (For procurement purposes, use only the definition in the FAR.)

9 Delegation of Procurement Authority . The official transfer of authority from GSA for the legal right to procure FIP resources. It is delegated by GSA to 00 and may be redelegated to an agency.

10 Disabled and Handicapped. This refers to persons having hearing, speech, sight, mental, motor impairments or those having loss of limbs.

11 FIP Equipment. Any equipment or interconnected system or subsystem of equipment used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information. This includes telecommunication equipment such as switches and telephone handsets. See FIRMR Bulletin 67 for more information.

12 FIP Maintenance. Those examination, testing, repair, or part replacement functions performed on FIP equipment and FIP software. See FIRMR Bulletin 67 for more information. This is part of FIP Support Service.

13 FIP Related Supplies. Any consumable item designed specifically for use with FIP equipment, FIP maintenance, FIP software, FIP services, or FIP support services. See FIRMR Bulletin 67 for more information.

14 FIP Resources. The same definition as Automatic Data Processing Equipment. FIP resources include FIP equipment, maintenance, related supplies, services, software

and support services. See FIRMR Bulletin 67 for clarification. Also see FIRMR 201-1.103, Applicability, for definition of the terms "incidental" and "significant" found in the definition for ADPE.

15 FIP Services. Any service, other than FIP support services, performed by using FIP equipment or FIP software. See FIRMR Bulletin 67 for clarification. See FIRMR Bulletin 67 for more information.

16 FIP Software. Any software, including firmware, specifically designed to make use of and extend the capabilities of FIP equipment. See FIRMR Bulletin 67 for more information.

17 FIP Support Services. Any commercial non-personal services, including FIP maintenance, used in support of FIP equipment, FIP software, or FIP services. See FIRMR Bulletin 67 for more information.

18 Information. Knowledge, facts, records, news, intelligence, data with meaning, and metadata (data on data) or opinions. These may be represented by numeric, graphic, image, sound, or textual forms of material. The material may be oral or collected, maintained and disseminated by any media. Information media include paper, microform, plus digital, optical and analog recordings, and holographic technology.

19 Information Resources Management. The totality of planning, budgeting, organizing, directing, training, promoting, controlling, and management activities associated with the burden, collection, creation, use, and dissemination of information by agencies, and includes the management of information and related resources such as FIP resources. This latter activity includes acquiring, using, disposing of, and evaluating IRM resources for meeting functional needs in program delivery.

20 Information Technology Facility . An organizationally defined set of IRM resources established to provide IRM services.

21 Interoperability. The ability of FIP resources to provide services to and accept services from other FIP resources and to use the services so exchanged to enable them to operate effectively together.

22 IRM Resources. FIP resources and non-FIP support services,

information, personnel, organizations, and utilities and facilities used with these resources.

23 Life Cycle. All the time for planning, approving, acquiring, installing, using, maintaining, and converting from or terminating the use of an IRM resource. One or more contracts may be included within this time.

24 Life Cycle Cost. All IRM and non-IRM resource costs which are attributable to the system that may and do accrue during the life cycle.

25 Major Acquisition. Projects that account for 10% or more of an agency's IRM budget as noted in the OMB Circular A-11 reports. Also, they may be projects that are

critical to agency mission accomplishment or warrant special management attention. They are major systems as defined in OMB Circular A-109.

26 Most Advantageous Alternative: The alternative that provides the greatest value to the Government over the system life in terms of price or cost, quality, performance, and any other relevant factors.

27 Non-FIP Maintenance. Personal services (from Government employees and others as appropriate) used in maintaining FIP equipment and software. This includes staff from other agencies and properly approved and funded personal services.

28 Non-FIP Support Service. Personal services (from Government employees and others as appropriate) used in support of FIP equipment, software and services. This includes staff from other agencies and properly approved and funded personal services. Costs of agency staff involved in use of the system, approval activities, and contracting administration are captured in Related Costs.

29 Parallel Review Process. A method by which an agency obtains TA, a DPA and legal and other needed concurrence for an acquisition of IRM resources. It is a cooperative and expedient way to work out approval for needed resources according to the laws, regulations and standards that apply. It uses a group known as an Acquisition Review Team (ART) to review, negotiate and approve issues and items connected with the acquisition.

30 Portability. The characteristic of applications that can be developed and run on one hardware and operating system environment and ported (moved) to another hardware and operating system environment with a minimum of modification and yield the same results. In fact, the ideal portable application would require no modification to move from one environment to another.

31 Related Costs. These are non-acquisition costs that may or do accrue to the system or project during the life cycle. These include direct (operational) and indirect (management and overhead) costs plus space, environment, utility, security and privacy, and other expenses.

32 RFC. Request for Comments, a request to industry, issued through a Commerce Business Daily announcement, for comments on a specification part of a solicitation, Section C. It is issued by a contracting officer.

33 RFI. Request for Information, a request to industry, issued through a CBD announcement, for comments and information on a proposed solicitation, industry capability in some technical area, technology assessment, or other such need. It is issued by a contracting officer.

34 Senior IRM Official. The one individual who is responsible for all IRM in the agency.

35 Sensitive Information.

(a) Any information which, the loss, misuse, unauthorized access, or modification of, would adversely affect the national interest or the conduct of Federal programs and the privacy to which individuals are

entitled under section 552a, USC (Privacy Act). This includes information designated as "PROCUREMENT SENSITIVE."

- (c) Information that is proprietary to a commercial firm.
- (c) System software for Types I and 11 computer installations. (see DM-3140, ADP Security Manual.)
- (d) Information designated as a vital record.
- (e) An application system and related data, which if compromised, could lead to fraud, theft, or illegal gains or compromise trusts, regulations, and commitments associated with any of the above.
- (f) Information likely to have an adverse affect on planned or ongoing investigations.
- (g) Information critical to personal life and safety.

36 Support Service. FIP support service and non-FIP support service.

37 System. A generic term covering any organization of IRM resources.

38 System Design Concept. An idea expressed in terms of general performance, capabilities, and characteristics of equipment, software, and services to meet information needs.

39 System Life. The authorized time for installing, using, maintaining, and converting from or terminating the use of an IRM resource.

40 System Life Cost. All IRM resource costs that accrue during the system life plus cost of planning, approving and acquiring those resources. The latter are administrative and contract action costs directly related to the acquisition process. It is the sum of both acquisition and related costs over the life cycle.

41 TA Threshold Level. The dollar limit an agency has for acquiring IRM resources without approvals from OIRM. At and below the level, an agency operates within its delegated authority.

42 Technical Approval. The acceptance by OIRM of all managerial and technical aspects of a proposed acquisition of IRM resources and its implementation and use by and for USDA. TA shows approval of specific items (see Section 12, Technical Approval).

43 Trail Boss. This is both the name of a GSA program and a person. The program speeds up obtaining IRM resources, improves acquisition management, and improves quality of resources. The individual is a highly qualified person with the authority and responsibility for conducting large acquisitions through implementation.

APPENDIX B

INTERNAL AND EXTERNAL REGULATIONS

Source	Publication	Title/Subject
OMB	Circular A-130	Management of Federal Information Resources
OMB	Circular A-120	Guidelines for the Use of Advisory and Assistance Services
OMB	Circular A-109	Major System Acquisition
OMB	Circular A-76	Performance of Commercial Activities
GSA	FAR	Federal Acquisition Regulation
GSA	CFR Title 41, Chapter 201,	Federal Information Resources Management Regulation
FIRMR		
GSA	CFR Title 41, Chapter 101, Section 25, 106	Servicing of Office Machines
USDA	DR 1110-2	Internal/Management Controls
USDA	DR 3040-1	Electronic Records Management Program
USDA	DR 3070-1	Micrographics Management
USDA	DR 3100-1	Departmental Systems Review Board
USDA	DR 3100-2	and Agency Information Resources Management Review Board
Amendment 1		
USDA	DR 3100-3	Departmental Electronic Mail System
USDA	DR 3111-1	Departmental Long-Range IRM

		Planning	
USDA	DR 3120-1	IRM Standards	
USDA	DR 3130-2	Microcomputer Policy	
USDA	DR 3130-3	Requesting Changes to Technical	
		Approval Thresholds	
USDA	DR 3130-4	Parallel Review Process and Trail	
		Boss Program	
USDA	DR 3140-1	USDA ADP Security Policy	
USDA	DM 3140-1	ADP Security Manual	
USDA	DR 3150-1	IRM Review Program	
		USDA National Computer	DR 3200-1 Services at the
		Center	
USDA	DR 3210	Data Base Development	
USDA	DR 3220-1	Direct Access Storage Device	
USDA	DR 3220-3	Software Management	
USDA	DM 3200-1	Application System Life Cycle	
		Management Manual	
USDA	DM 3200-2	A Project Manager's Guide to	
		Application Systems Life Cycle	
		Management	
USDA	DR 3220-4	Operating System Software	
		Management	
USDA	DR 3230-1	ADP Equipment Maintenance	
USDA	DR 3230-2	Disposition of Excess ADP Equipment	
USDA	DR 3300-1	Telecommunications	

USDA	DR 5000-1	Consulting Services
USDA	DR 5000-2	Contracting for Consulting Services
USDA	DR 5000-4	Legal Review of Certain Procurement
Actions		
USDA	DR 5020-2	Security and Privacy Act
Requirements for ADP and WP		
Acquisitions		
USDA	DR 5039-3	Agency Procurement Requests for
Delegations of Authority for ADP		
Acquisitions		
USDA	DR 5039-5	Delegation of Procurement
Authority/Technical Approvals for		
ADP		
USDA	DR 5048-1	Value Engineering -- Implementation
of OMB Circular A-131		
USDA	TAB	Technical Approval Bulletin
USDA	AGAR 415	Agriculture Acquisition Regulation

END