

EVALUATION REPORT

REVIEW OF SBA'S IMPLEMENTATION OF THE FEDERAL INFORMATION TECHNOLOGY ACQUISITION REFORM ACT





EXECUTIVE SUMMARY

REVIEW OF SBA'S IMPLEMENTATION OF THE FEDERAL INFORMATION TECHNOLOGY ACQUISITION REFORM ACT

Report No. 18-06

November 28, 2017

What OIG Reviewed

This evaluation report summarizes the results of our review of the Federal Information Technology Acquisition Reform Act (FITARA).

Our objective was to assess the Agency's progress in implementing the objectives of FITARA as outlined in Office of Management and Budget (OMB) Memorandum M-15-14, *Management and Oversight of Federal Information Technology*. The scope of our analysis included assessing the Agency's progress in implementing critical components of FITARA from October 2015 to June 2017. The Small Business Administration (SBA) identified implementation of FITARA as integral to meeting its strategic goal of implementing and maintaining modern, secure, and reliable information technology (IT) systems and services.

What OIG Found

We found that although SBA has made progress in implementing FITARA, it needs to consistently establish performance baselines for its IT investments and update system development guidance to reflect current project implementation methodologies. Additionally, it needs to fully deploy a strategy for implementing enterprise architecture and implement an IT workforce planning process.

To determine progress against FITARA criteria, we interviewed Agency personnel, reviewed supporting documentation, and tested four major IT investments. We also reviewed updated and existing standard operating procedures.

OIG Recommendations

We provided six recommendations to improve implementation of FITARA: (1) ensure that SBA's IT oversight body tracks baselines, (2) measure and report IT project performance against baselines, (3) update system development policies and procedures, (4) incorporate IT architecture review into the acquisition program, (5) implement IT architecture guides, and (6) develop IT workforce competencies.

Legend – SBA's FITARA Progress	
Policies, procedures, and strategy are not formalized or implemented.	<input type="checkbox"/> <input type="checkbox"/>
Policies, procedures, and strategy are formalized, but are not fully implemented.	<input checked="" type="checkbox"/> <input type="checkbox"/>
Policies, procedures, and strategy are both documented and are fully implemented.	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>

FITARA Common Baseline Assessment	
Acquisition and Execution	
Ongoing CIO engagement with program managers.	<input type="checkbox"/> <input type="checkbox"/>
CIO defines IT processes and policies.	<input type="checkbox"/> <input type="checkbox"/>
CIO reviews and approves acquisition strategy/plans.	<input checked="" type="checkbox"/> <input type="checkbox"/>
Shared acquisition and procurement responsibilities.	<input checked="" type="checkbox"/> <input type="checkbox"/>
Visibility of IT planned expenditure reporting to CIO.	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
CIO role on program governance boards.	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
CIO role in IT projects or initiatives.	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
Budget Formulation and Planning	
CIO role in planning program management.	<input type="checkbox"/> <input type="checkbox"/>
Visibility of IT resource plans/decisions to CIO.	<input checked="" type="checkbox"/> <input type="checkbox"/>
CIO reviews and approves major IT investments.	<input checked="" type="checkbox"/> <input type="checkbox"/>
CIO role in pre-budget submission for IT programs.	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>
Organization and Workforce	
IT Workforce Planning.	<input type="checkbox"/> <input type="checkbox"/>
CIO reports to Agency head (or deputy/COO).	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>

Agency Response

SBA management agreed with the findings and recommendations of this report. The Agency took corrective actions related to recommendation 1 and recommendation 2. Consequently, we consider the recommendations to be closed. The Office of the Chief Information Officer further stated that both the Agency and their office remain committed to implementing all aspects of FITARA.



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

Final Report Transmittal
Report No. 18-06

DATE: November 28, 2017

TO: Linda E. McMahon
Administrator

FROM: Hannibal "Mike" Ware 
Acting Inspector General

SUBJECT: *Review of SBA's Implementation of the Federal Information Technology Acquisition Reform Act*

This report contains the results of our review of the Small Business Administration's (SBA's) implementation of the Federal Information Technology Acquisition Reform Act (FITARA). The objective of our evaluation was to assess SBA's progress in implementing critical components of FITARA, as outlined in the Office of Management and Budget (OMB) Memorandum M-15-14, *Management and Oversight of Federal Information Technology*, and the related Common Baseline.

We previously furnished copies of the draft report and requested written comments on the recommendations. SBA management comments are in Appendix II and were considered in finalizing the report. The report contains six recommendations that SBA agreed to address. Based on SBA's response, recommendations 1 and 2 are closed for final action, and recommendations 4 through 6 will remain open until the Office of Inspector General receives documentation demonstrating that these recommendations have been addressed. Please provide us within 90 days your progress in addressing these recommendations.

We appreciate the courtesies and cooperation extended to us during this evaluation. Please contact Jeffrey R. Brindle at (202) 205-7490 or me at (202) 205-6586, if you have any questions.

cc: Allie Leslie, Deputy Administrator
Mary Anne Bradfield, Chief of Staff
Joseph Loddio, Chief Operating Officer
Maria Roat, Chief Information Officer
Guy Cavallo, Deputy Chief Information Officer
Timothy Gribben, Chief Financial Officer and Associate Administrator for
Performance Management
Chris Pilkerton, General Counsel
Pradeep Belur, Senior Advisor to the Administrator
Martin Conrey, Attorney Advisor, Legislation and Appropriation
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Introduction

On December 19, 2014, Congress passed the Federal Information Technology Acquisition Reform Act (FITARA) to give Agency Chief Information Officers (CIOs) greater authority over IT investments. This legislation's goal is to realize long-term cost savings through improved IT risk management, transparency, and more effective IT investment oversight. FITARA empowers CIOs to make decisions on IT project planning and implementation, such as governance, budgeting, contracting, and personnel. The law requires closer collaboration between the CIO, Chief Financial Officer (CFO), Chief Acquisition Officer, and Chief Human Capital Officer (CHCO).

This coming fiscal year, the Small Business Administration (SBA) plans to spend approximately \$100 million on information technology (IT) investments. According to SBA's fiscal year (FY) 2018 budget justification, implementation of FITARA is integral to building effective IT management and investment practices and guiding use of IT resources for decision-making. Also, FITARA provides a framework to build on IT investments and governance best practices.¹

FITARA sets a "Common Baseline," which requires the Office of the Chief Information Officer (OCIO) to improve transparency and risk management through the following areas:

- Acquisition and Execution, where the CIO defines the development processes, milestones, review gates, and the overall policies for all capital planning, enterprise architecture, and project management and reporting for IT resources. The CIO should establish and maintain a process to regularly engage with program managers to evaluate IT resources supporting each Agency strategic objective.
- Budget Formulation and Planning, by which the CIO and CFO define IT resources. The CIO shall be included in the internal planning processes for how the Agency uses IT resources to achieve its objectives. This includes CIO involvement with planning for IT resources at all points in the lifecycle, including operations and disposition or migration.
- Organization and Workforce, where the CIO and CHCO jointly develop standards and IT staff and ensure the Agency can recruit and retain IT staff to complete the Agency's mission.

Objectives

Our objective was to assess SBA's progress in implementing critical components of FITARA, as outlined in the Office of Management and Budget (OMB) Memorandum M-15-14, *Management and Oversight of Federal Information Technology*, and the related Common Baseline.

Results

SBA's OCIO made significant progress in improving its oversight of IT investments and deploying other key components of FITARA. Policies and related governance protocols have been revised to ensure OCIO plays a major role in the entire IT investments cycle, from strategic planning to implementation. Critical OCIO human resources have been augmented with the hiring of a Deputy CIO and other key IT personnel.

¹ SBA FY 2018 Congressional Budget Justification and FY 2016 Annual Performance Report.

However, SBA needs to fully implement all aspects of the FITARA Common Baseline. Specifically, we found enhancements are needed in Acquisition and Execution, Budget Formulation and Planning, and Organization and Workforce. OCIO authorities and related standard operating procedures (SOPs) need to be enhanced and fully implemented to cover FITARA guidance in multiple investment control areas, such as IT investment performance baseline management, agile project management methodology, and cloud migration development controls. SBA also needs to implement a plan to assess IT workforce needs to ensure organizational resiliency in responding to changing IT risks and requirements. The FITARA Common Baseline areas that have not been formalized or implemented are outlined in this report and require immediate SBA management attention.

Legend – SBA’s FITARA Progress	
Policies, procedures, and strategy are not formalized or implemented.	<input type="checkbox"/> <input type="checkbox"/>
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FITARA Common Baseline Assessment	
Acquisition and Execution	
Ongoing CIO engagement with program managers.	<input type="checkbox"/> <input type="checkbox"/>
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CIO reports to Agency head (or deputy/COO).	<input checked="" type="checkbox"/> <input checked="" type="checkbox"/>

Finding 1: SBA's IT Project Baseline Information Needs to Be Reported to the BTIC and Incorporated Into the Federal IT Dashboard (Acquisition and Execution)

The FITARA Common Baseline requires the CIO to establish an effective process to regularly engage with program managers to evaluate IT resources supporting each Agency's strategic objective. SBA's SOP 90-52, *IT Investment Performance Baseline Management*, states that project managers are responsible for developing and maintaining the IT project baseline. In addition, the policy states that SBA's Business Technology Investment Council (BTIC) serves as the senior executive review body and is responsible for ensuring that IT investment baselines answer business needs and are aligned with SBA's mission, strategic goals, and objectives.

Recently, SBA has made improvements in its IT oversight.² The BTIC held periodic meetings in accordance with SBA's SOPs since February 2016. These meetings included reports of IT project activities. However, the minutes and agendas of these meetings did not include performance baseline information on active investments necessary to discharge its oversight duties under SOP 90-52. Specifically, the BTIC did not track several major IT investments (Certify.sba.gov, SBA.gov, Small Business Innovation Research [SBIR], and Human Resources Line of Business [HR LOB]). From February 2016 to February 2017, the four IT project teams did not provide the BTIC comprehensive performance baseline data, which would allow the governing body to assess progress against predetermined milestones, budgets, and deliverables. Furthermore, without data on the Certify.sba.gov, SBA.gov, SBIR, and HR LOB initial baselines, and subsequent updates, we could not determine the accuracy of SBA's submissions to the Federal IT Dashboard. As a result, accurate project progress and accomplishments were not reported in accordance with OMB guidance on IT and E-Government. This guidance states the IT Dashboard is used by the Administration and Congress for budget and policy decisions.

The Federal IT Dashboard is a visual representation of SBA's IT portfolio management process and uses baseline data. Each month, SBA program offices' project managers are responsible for submitting their major IT investment data to the Federal IT Dashboard, and OCIO coordinates the timeframes and reviews their submissions.³ SBA is responsible for developing and maintaining a Performance Baseline Management System for tracking project schedules, milestones, and costs against predetermined benchmarks, and this system should feed the Federal IT Dashboard.

In June of 2017, the CIO conducted a TechStat accountability session (TechStat) for Certify.sba.gov to further understand performance against baselines and developed an action plan for correction. The TechStat identified that the project's releases were delayed by 8 months, the cost for FY 2017 increased by \$492,590, and the FY 2018 estimate increased by \$1.886 million. Prior to the

² January 2016 to June 2017, SBA placed the Digital Service Office (DSO) under the Chief Operations Officer. The structure limited the CIO's ability to comply with the FITARA Common Baseline and 44 U.S.C. § 3506 (Clinger-Cohen Act). SBA subsequently moved the DSO under the OCIO in July of 2017. OIG previously expressed concern about the DSO organizational structure in FY 2017 Management Challenge 2, *SBA's IT Leadership Capabilities Need Strengthening to Address Operational Risks and Challenges*. We observed that this structure created a dual or overlapping accountability in the CIO's role for IT investment oversight.

³ OMB Circular A-11 Part 7 Section 300 defines a major investment as a system or acquisition requiring special management attention because of its importance to the mission or function of the Agency, a component of the Agency, or another organization; is for financial management and obligates more than \$500,000 annually; has significant program or policy implications; has high executive visibility; has high development, operating, or maintenance costs; is funded through other than direct appropriations; or is defined as major by the Agency's capital planning and investment control process.

TechStat, Certify.sba.gov was not re-baselined to reflect changes in scope, schedule, and project cost.

Recommendations

1. We recommend that the CIO ensure that BTIC sessions review and track performance management baselines for all major IT investments, as required by SOP 90-52.
2. We recommend that the CIO require that project performance is measured against predetermined baselines, and ensure that progress against baseline source data is reported to the Federal IT Dashboard, as required by OMB Circular A-11.

Finding 2: System Development Methodologies Need Revision to Meet FITARA Objectives (Acquisition and Execution)

The FITARA Common Baseline requires the CIO to define the development processes, milestones, review gates and the overall policies for all capital planning, enterprise architecture, and project management and reporting for IT resources. SBA's system development methodology (SDM) process provides project managers guidance in meeting these FITARA Common Baseline requirements.

SBA has yet to update its SDM to reflect current IT development processes and resource strategies. In its December 2015 FITARA implementation plan, SBA emphasized the importance of an updated SDM to monitor project activity. This plan further states that the revised SDM will include selection criteria, agile project management methodology, and deliverance of major system components every 6 months. SBA's current SDM guidance, System Development Method 2.1, issued June 2009, does not fully address several current project activities, such as the use of agile methodologies and cloud migration.

The lack of effective SDM policies and current criteria hinders OCIO's ability to engage and monitor project results. For all of SBA's enterprise wide development efforts, SDM guidance facilitates accurate baseline reporting, project scope management, change control disciplines, security testing protocols and adherence to quality standards.

Recommendation

3. We recommend that the CIO utilize updated SDM policies as required in the FITARA Common Baseline. Such policies and procedures should reflect current IT development strategies, such as cloud solutions and agile.

Finding 3: IT Acquisition Planning Needs to Incorporate the Architecture Review Board’s Oversight (Budget Formulation and Planning)

FITARA guidance requires the CIO to participate in the internal planning processes for utilization of IT resources. To achieve this objective the CIO has established an oversight role that encompasses relevant processes, milestones, review gates, and the overall policies for all capital planning, enterprise architecture, and project management and reporting for IT resources.

SBA’s IT organization is a highly decentralized model that has a shared strategy and infrastructure, with development and support activities distributed throughout program offices.⁴ OCIO’s Architecture Review Board (ARB) charter requires the board to oversee the strategic implementation of IT resources, architecture, and design. Our review showed that the ARB did not assess resources, architecture, and design for Certify.sba.gov, SBA.gov, SBIR, and HR LOB. Furthermore, the ARB has yet to finalize its Assessment Preparation Guidelines and System Authorization Process Guide.

Moreover, SOP 20-21, *The Government Acquisition Program*, does not explicitly integrate the ARB into acquisition planning. Early involvement of the ARB is required to support the process of IT researching, investing, architecting, and implementing IT capabilities and services. The ARB also is designed to ensure SBA’s business needs apply best practices to ensure cost-effective implementation.

SBA established the ARB to implement the FITARA Common Baseline elements of IT resource planning processes and allocation. In addition, the ARB should serve as a major tool for the CIO to approve the IT components of any planned IT investments. In order to develop the appropriate project scope and alignment with enterprise standards, ARB members should collaborate with the project teams during the early phases of a project. To this end, the ARB should conduct a Preliminary Assessment early in the project lifecycle and a Full Assessment when the system requirements and design are complete.

Since the ARB’s inception in September 2015, it has had limited involvement with program offices related to the four evaluated systems. With the ARB having limited involvement over IT projects, the CIO is unable to meet FITARA’s mandate for a centralized support process comprised of an effective ARB. Consequently, the lack of ARB hinders the Agency’s ability to promote sound decision-making with regard to IT architecture and design, and ultimately realize cost savings.

Recommendations

4. We recommend that the CIO ensure that the Architecture Review Board supports SBA’s IT acquisitions programs, as outlined by the board’s charter.
5. We recommend that the CIO ensure ARB’s assessment guides and related criteria are used for all major IT investments.

⁴ The OCIO reorganization proposal states that SBA has a decentralized IT structure.

Finding 4: Assessment Needed to Establish IT Staff Competency and Workforce Requirements (Organization and Workforce)

The FITARA Common Baseline requires that the CIO and the CHCO develop a set of competency requirements for IT staff, including IT leadership positions, and develop and maintain a current workforce planning process to ensure the department/Agency can anticipate and respond to changing mission requirements, maintain workforce skills in a rapidly developing IT environment, and recruit and retain the IT talent needed to accomplish the mission.

OCIO did not perform an IT workforce assessment as required by FITARA criteria. OCIO stated that their office did not perform an IT workforce assessment of SBA because of funding issues. OCIO stated that if additional funds are secured, the office would perform the assessment.

IT personnel across SBA are critical to meeting this capability as OCIO develops and implements an enterprise security technology architecture that reduces SBA's overall risk exposure. To be most effective, IT must align to the functional needs of an Agency, improve cross-organizational communication, respond quickly to business opportunities and threats, and ensure that the Agency's organization and workforce strategies are integrated to support the Agency's IT functions. To maximize the success of each program in meeting its unique business drivers, there needs to be cooperation and communication between the OCIO and program offices, as organizational and workforce processes are integrated to reflect inclusion of all necessary inputs and to eliminate unnecessary duplication. Implementing consistent and repeatable processes in incident prevention, detection, and response across the organization requires integration of IT workforce standards into SBA program offices.

Recommendation

6. We recommend that the CIO develop IT competency requirements for staff and leadership positions, as well as design workforce planning protocols that comply with the FITARA Common Baseline.

Analysis of Agency Response

SBA management provided comments and substantially agreed with our recommendations.

Summary of Actions Needed to Close the Recommendations

The following provides the status of each recommendation and necessary actions to close the recommendations.

1. Closed. The CIO will incorporate all performance baselines into BTIC session agendas to ensure CIO involvement in the review process. Additionally, all performance baseline changes will follow a previously established approval process within SBA's portfolio tool (eCPIC).
2. Closed. The CIO will continue to review project performance for all IT investments and provide updates of risks, performance metrics, project, and activity data for major IT investments to the Federal IT Dashboard as soon as the data becomes available, or at least once each calendar month.

3. Resolved. By December 15, 2017, the OCIO will have updated its SDM to incorporate preferred IT development strategies, including agile and cloud solutions, as required by FITARA. Furthermore, the CIO will ensure that the updated SDM is used to inform the proper planning and execution of all IT projects.
4. Resolved. By March 31, 2018, the CIO will ensure OCIO actively engages with program offices to use the ARB processes (as outlined by a revised ARB charter to be completed by March 2018) to support SBA IT acquisitions programs, and to provide guidance to programs for the alignment with SBA's enterprise architecture consistent with the guidance provided by the Federal Enterprise Architecture Framework, the Office of Management and Budget, and the Government Accountability Office.
5. Resolved. By March 31, 2018, the CIO will ensure the development of the ARB assessment process for new IT capabilities, IT modernization, and system enhancements. The ARB assessment will integrate CPIC, enterprise architecture, IT security, network operations, and OCIO's Program Management Office for all major IT investments.
6. Resolved. By May 31, 2018, the CIO will partner with the Chief Human Capital Officer to collect capability requirements, develop a holistic approach to determine personnel requirements, and develop a competency and workforce plan around information technology. As part of its FITARA implementation plan, SBA committed to developing a set of competency requirements and developing and maintaining an IT workforce planning process.

Appendix I: Objectives, Scope, and Methodology

Our objective was to determine whether SBA’s implementation of FITARA follows applicable Federal guidance and standards, such as those outlined OMB Memorandum M-15-14, *Management and Oversight of Federal Information Technology*. The scope of our analysis included assessing the Agency’s progress in implementing critical components of FITARA from October 2015 to June 2017.

To answer our objective, we interviewed and reviewed relevant documentation from OCIO and IT project managers and system owners. In addition to reviewing SBA’s policies and procedures, we judgmentally selected four major IT investments (Certify.sba.gov, SBA.gov, SBIR, and HR LOB) to evaluate compliance with FITARA guidance and existing SBA SOPs.

We conducted this evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency’s quality standards for inspection and evaluation. Those standards require that we adequately plan and perform the evaluation to obtain sufficient and appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objectives. We believe that the evidence obtained provides a reasonable basis for our conclusions based on our objectives.

Prior Work

FITARA deployment is periodically assessed by Congress. The Oversight and Government Reform committee with the Government Accountability Office (GAO) developed a scorecard to assess agencies’ FITARA implementation efforts on a biannual basis. Furthermore, the GAO has issued several reports addressing SBA’s challenges in the areas of acquisition and operations, application inventory, and human resources management regarding IT investments.^{5,6} The reports outline challenges faced by SBA in ensuring that there are clear lines of authority to effectively carry out the Agency’s mission, conducting workforce assessments to identify skill gaps and to assess high turnover, and conducting TechStat and PortfolioStat sessions to better manage significant IT investments.^{7,8}

⁵ GAO Report 17-263T, *Improved Implementation of Reform Law Is Critical to Better Manage Acquisitions and Operations*.

⁶ GAO Report 16-511, *Agencies Need to Improve Their Application Inventories to Achieve Additional Savings*.

⁷ GAO Report 15-347, *Small Business Administration: Leadership Attention Needed to Overcome Management Challenges*.

⁸ GAO Report 14-65, *Information Technology: Additional OMB and Agency Actions Are Needed to Achieve Portfolio Savings*.

**SBA CHIEF INFORMATION OFFICER
RESPONSE TO THE EVALUATION REPORT**



MEMORANDUM FOR: HANNIBAL M. WARE
INSPECTOR GENERAL (ACTING)
U.S. SMALL BUSINESS ADMINISTRATION

THRU: MARIA A. ROAT
CHIEF INFORMATION OFFICER
U.S. SMALL BUSINESS ADMINISTRATION

Subject: Management Response:
Draft SBA's Implementation of the Federal Information
Technology Acquisition Reform Act (FITARA), Project 17006

Dates: November 16, 2017

We appreciate the opportunity to provide comments on the draft report entitled, "SBA's Implementation of the Federal Information Technology Acquisition Reform Act", and thank the Inspector General's staff for their consideration of our response. The Office of the Chief Information Officer concurs with four recommendations and requests the closure of recommendation 1 and 2.

SBA and the Office of the Chief Information Officer remains committed to fully implementing all aspects of FITARA and providing quality Information Technology (IT) services.

APPROVED:

/s/signature

Maria A. Roat
Chief Information Officer
U.S. Small Business Administration