Policy on IT Acquisition Strategies and Planning Under FITARA

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I. Purpose

[01] To provide policy and direction for the reviews and approvals required for the acquisition of information technology (IT) products and services as set forth in the Department of Commerce (DOC) IT Portfolio Management Strategy and the Federal Information Technology Acquisition Reform Act (FITARA).

[02] To provide a roadmap for navigating approval processes and to assist Project and Program Managers (PMs) in factoring these required approvals into their procurement

administrative lead times (PALT) and project milestones.

[03] To supercede and rescind the NOAA Directive on IT Investment Authority dated February 23, 2015.

II. Scope

[01] This Policy applies to all procurements in NOAA and provides a mechanism for the identification and processing of both IT and non-IT products and services.

[02] This Policy does not apply to Grants and Interagency Agreements.

[03] This Policy is acquisition-vehicle neutral.

III. Authorities and References

[01] Department IT Portfolio Management Strategy (June 2012)

[02] Mandatory NOAA CIO Approval for All Information Technology Products and Services (August 2012)

[03] Federal Information Technology Acquisition Reform Act (FITARA) (December 2014)

[04] OMB Memorandum M-15-14: Management and Oversight of Federal Information Technology (June 2015)

[05] Delegation of Authority to the NOAA CIO under the Federal Information Technology Acquisition Reform Act (FITARA) (August 2016)

[06] NOAALink Procurement Worksheet

[07] Commerce Acquisition Manual (CAM) 1307.1, Acquisition Planning (September 2017)

[08] Clinger-Cohen Act (aka Information Technology Management Reform Act of 1996)

[09] Department CIO Review of Acquisitions over $10M in Life Cycle Costs (January 2017)

[10] DOC Information Technology Review Program Charter (December 2016)

[11] Acquisition Instruction 17-02, Procedures for Milestone Acquisition Plans (February 2017)

[12] Acquisition Instruction 13-01, NOAA Acquisition Review Board Procedures (June 2013)

[13] Micro-Purchase Threshold Increase (10-1-2015) FAC 2005-83

IV. Policy

[01] An IT Investment Authority (ITIA) is required for all procurements containing IT. An ITIA is the (A)CIO's certification of a valid IT requirement and a recommendation for an acquisition strategy. The ITIA issuing authority depends on the dollar amount of the IT included in the acquisition. The operating definition of IT is included in Section XI. Definitions.

[02] The acquisition strategy document for all procurements containing IT must be reviewed and approved by the cognizant Assistant CIO (ACIO), NOAA CIO, or DOC CIO. The acquisition strategy approval authority depends on the dollar amount of a) the acquisition life cycle and b) the IT included. In addition, the acquisition strategy document for all non-IT procurements with a lifecycle acquisition value of $10M or greater must be reviewed and approved by the DOC CIO.

[03] Each Line Office (LO) ACIO and the NOAA CIO for Staff Offices (SO) will establish an internal board, committee, or council to review acquisitions with a lifecycle cost greater than $150K and determine the presence of IT (herein referred to as the Information Resource Management Advisory Committee, or IRMAC). IRMAC bodies will issue an Investment Review Determination (IRD) for each acquisition as evidence of review and the IRD number will be included with the purchase request.

[04] The following table summarizes the review and approval authorities and associated documents for ITIAs and acquisition strategy and planning documents.

Acquisition Amount	IT Amount	ITIA Approval Authority	Acquisition Strategy Document	Acquisition Strategy Approval Authority	Other notes
≤ $150K	$0	N/A	N/A	N/A	
$150K <$10M	$0	N/A	MAP	CO	
>$10M<$75M	$0	N/A	AP	DOC CIO/SBPO	NOAA CIO issues supporting memo
>$75M	$0	N/A	AP	DOC CIO/SPE	SBPO concurs after NOAA ARB; NOAA CIO issues supporting memo
≤ $150K	< $150K	Blanket ITIA from NOAA CIO	N/A	N/A	
$150K < $10M	< $150K	Blanket ITIA from NOAA CIO	MAP	ACIO for LO OCIO for SO /CO	
$150K < $10M	$150K < $10M	ACIO for LO CIO for SO	MAP	ACIO for LO CIO for SO	Use of non-IT vehicles requires CIO approval

≥ $10M < $75M	$150K < $10M	ACIO for LO CIO for SO	AP	DOC CIO/SBPO	NOAA CIO issues supporting memo
≥ $10M < $75M	≥ $10M	DOC CIO	AP	DOC CIO/SBPO	NOAA CIO issues supporting memo
≥$75M	≥ $10M	DOC CIO	AP	DOC CIO/SPE	SBPO concurs after NOAA ARB, NOAA CIO issues supporting memo,DOC CIO and SPE approves after joint CITRB and DOC ARB

ARB = Acquisition Review Board
AP = Formal Acquisition Plan
CITRB = Commerce IT Review Board
MAP = Milestone Acquisition Plan
SBPO = Senior Bureau Procurement Officer
SPE = Senior Procurement Executive

[05] When reviewing MAPs and APs, (A)CIOs will review and approve appropriateness of contract type and vehicle.

[06] The NOAALink Program Office (NPO) provides the NOAA CIO with assessment and evaluation support and has an expanded role in the acquisition/planning phase, particularly the IT requirements definition phase. NPO shall review, assess, and evaluate all requirements involving $150K or greater of IT and provide advice to PMs on the IT aspects of the requirements. NPO also reviews MAPs submitted to the (A)CIO and APs submitted to the NOAA CIO for review, concurrence, and forwarding to the DOC CIO.

[07] For detailed direction on the implementation of this Policy, refer to the Procedure on IT Acquisition Strategies and Planning under FITARA.

V. Responsibilities

[01] The DOC CIO, NOAA CIO, or delegated LO ACIO is responsible for reviewing and approving ITIAs, MAPs, and APs, per above Section IV.

   [A] An ITIA under $10M is issued by the (A)CIO (i.e., the NOAA CIO or a delegated LO ACIO).

   [B] An ITIA equal to or greater than $10M is issued by the DOC CIO.

[02] NOAA AGO is responsible for developing, reviewing, and approving all MAPs and APs and ensuring that the appropriate (A)CIO or DOC CIO has reviewed and approved all MAPs and APs, per above Section IV.

[03] NPO provides full IT acquisition lifecycle service delivery and program/project management support to the CIO, (A)CIOs, PMs, and customers, throughout the entire IT acquisition lifecycle. There are four distinct phases for the IT acquisition lifecycle: 1) ITIA/Acquisition Planning Phase; 2) Pre-Award Phase; 3) Award Phase; and 4) Post-Award Phase. In addition, NPO enables the NOAA IT strategy through the establishment of NOAA-wide IT acquisitions and solutions for services and commodities. The NPO range of responsibilities varies throughout the acquisition phases and specific details are further provided on the NPO website.

The NPO works with (A)CIOs, PMs, and stakeholders to validate compliance and fidelity with IT policies and procedures, review for existing or planned NOAA-wide IT solutions and NOAA IT strategic sourcing vehicle opportunities, support IT investment reporting for FITARA data calls, and ensure compliance with IT mission and business objectives as specified in the IRM Plan and the DOC or NOAA Enterprise Architecture. IT solutions for services and products will be fulfilled by recognized IT contracts and suppliers. Specific processes, procedures, and supporting tools for this section are provided on the NPO website.

[A] As tasked by the CIO, NPO will assess and evaluate acquisition vehicles/contracts to determine if they are appropriate to provide solutions for NOAA IT requirements. NPO, together with AGO, will make determinations as to whether any IT requirements are best fulfilled by the NOAALink core IT contract(s), non-core IT contract(s) (such as GWAC IT acquisition vehicles), or other recognized IT contracts. Whether core IT contract or non-core IT contract, or fulfilled by any AGO office, an IT contract requires NPO engagement. The NPO's role will be determined case-by-case.

[B] During the ITIA/acquisition planning phase, NPO will assess and evaluate all requirements with $150K or greater of IT in support of the LO/SO IRMAC. NPO, in partnership with AGO, will work with PMs, Project Teams, and stakeholders on characterization of the requirement as appropriate for an IT or non-IT acquisition plan. NPO will provide an appropriate response to the requirement.

[C] During the Pre-Award Phase, NPO will perform acquisition management and/or support for IT procurements. NPO responsibilities will include, but not be limited to, managing procurements that: 1) affect information systems regardless of FIPS 199 impact level; 2) create or manage an IT system or infrastructure before mission or mission support data can be observed, ingested, assimilated and modeled, processed, disseminated, or archived; 3) present cybersecurity and/or supply chain risk; 4) require significant IT professional capabilities; 5) require application and software development and management; or 6) support other IT areas further defined on the NOAALink website. The NPO is also tasked to improve IT acquisition practices across NOAA by providing NOAA-wide visibility for IT acquisition requirements and facilitating the creation of NOAA-wide solutions. NPO will assist in refining and clarifying requirements to produce IT acquisitions that are clear, complete, and ready for the market research phase.

[D] During the Award Phase, NPO will assist in preparation and/or review for the comprehensive completion of the requisition package for all requisition supporting documentation, which includes but may not be limited to: 1) Statement of Need (SON) (Products) or Statement of Work (SOW)/Performance Work Statement (PWS)/Statement of Objectives (SOO) (Services); 2) Independent Government Cost Estimate (IGCE); 3) 508 Compliance Checklist; 4) IT Security Checklist; 5) NOAALink Worksheet; 5) Brand Name Justification (BNJ) (if applicable); 6) Sole Source Justification (if applicable); 7) Late Memo (if applicable); and 8) any other specific requisition requirements, as specified on the NOAALink website. NPO will provide feedback to the customer, when required case-by-case, which will include a marked and attached NOAALink worksheet which provides guidance/direction as to whether the requisition package is complete. NPO will follow up and work with customer/AGO, as appropriate. NPO will serve as the Contracting Officer's Representative (COR), and provide COR services as applicable whenever an IT contract or contract vehicle is employed to meet the requirement.

[E] During the Post-Award Phase, NPO will assist in performance monitoring and management at required levels to ensure contractor performance meets contractual requirements and that internal controls are in place to guard against fraud, waste, mismanagement and/or misappropriation across the post-award process. NPO will ensure documentation is captured for performance management; provide IT subject matter expertise, status, and appropriate assistance to LOs/SOs, PMs, (A)CIOs, AGO, OCIO, internal, and external customers; escalate monitoring issues to appropriate levels; and promote and model a collaborative environment where parties are treated fairly and equitably in accordance with regulations.

[F] For non-severable IT requirements (normally ones which do not include operating or directly changing NOAA IT systems, that are not acquired through a NOAALink core contract, other IT contract vehicle, or stand-alone IT contract), NPO will work with AGO and PMs to identify appropriate clauses, labor categories, security criteria, and mechanisms to identify and track costs for FITARA reporting.

[G] All requisitions above the micro-purchase threshold that contain IT requirements must be routed to and reviewed by NPO. For guidance of IT requisitions above the micro-purchase threshold and below $150K, refer to the NPO website.

[H] Quantitative and/or qualitative comments by NPO for any phase throughout the acquisition lifecycle may include, but may not be limited to: 1) IT Task Code and NOAALink Object Class code references; 2) Labor categories and cost items; 3) Requirements language; 4) Cybersecurity criteria; and 5) Any other appropriate criteria or documentation.

[I] NPO need not be a member of any LO IRMAC or IT Review Board, but may be invited to participate by the IRMACs.

[04] The Governance and Portfolio Division (GPD) within the NOAA OCIO will administer the

processes to facilitate the NOAA IT acquisition process. GPD will develop and manage a shared online system to assist AGO and NPO in the development, tracking, and management of IRDs, ITIAs, and APs through their approval process. This online system will also serve as a repository of all IRDs, ITIAs and APs to assist in determining if a planned IT acquisition is covered by an existing ITIA or if a new ITIA will be required.

[05] All NOAA employees who requisition any type of IT products and services, as set forth in the DOC IT Portfolio Management Strategy and FITARA, are responsible for doing so in accordance with this Policy.

[06] The NOAA CIO reviews and provides concurrence on all NOAA ITIAs and APs prior to their submission to the DOC CIO.

[07] The Program or Project Manager (PM) (i.e. requisitioner) develops the acquisition package according to NPO and AGO guidance and is responsible for obtaining the required IRD and ITIA before an acquisition is submitted for processing.

[08] NOAA individuals or councils/boards with review and/or concurrence/approval authority and responsibilities under this policy will have 10 working days to review and approve formally submitted ITIAs and APs.

[09] LO/SO IRMACs provide: (i) a high level technical advisory function; (ii) information exchange related to the implementation and execution of IT policy and related activities; (iii) decision making related to IT procurements; and (iv) enterprise and business-level planning. Each IRMAC has a documented review process. The IRMAC will review and determine whether acquisitions are non-IT or include the procurement of IT products or services. It will provide guidance to the PM as to whether procurements include IT and whether a new ITIA is required or an existing ITIA is applicable. The NOAA CIO (in coordination with the LO Assistant Administrator or SO Director) reserves the right to overrule any IRMAC IRD in accordance with an LO's delegation. An IRMAC may issue and apply a single IRD to a group of multiple or similar procurements when it makes sense to do so.

[10] The OCIO and AGO will collaborate to develop an acquisition strategy. Any disagreements between the OCIO and AGO will be resolved at the lowest possible level with ultimate resolution by the NOAA CIO and AGO Director.

VI. Management and Ownership

The GPD of the NOAA OCIO will manage this Policy and serve as its steward.

VII. Intended Audience

This Policy applies to any NOAA employee who requisitions any type of IT products and services, as set forth in the DOC IT Portfolio Management Strategy and FITARA.

VIII. Implementation Date

This Policy is effective immediately for implementation of all FY19 (and onward) acquisitions.

IX. Grandfather Exemption and Waiver Option

None.

X. Performance Objectives and Measurements

None.

XI. Definitions

[01] Formal Acquisition Plan:

A formal acquisition plan identifies all significant technical, cost, and business issues of a requirement and provides specific solutions to address any critical issues in the proposed acquisition. The AP also identifies the applicable NOAA (or DOC) ITIA. See CAM 1307.1 for more information on acquisition plan requirements.

[02] Commerce Information Technology Review Board:

CITRB is part of the Department's Investment Review Process and is focused on new or re-competed acquisitions required to support major investments and non-major investments with life cycle costs at or above $10M. The DOC CIO determines those initiatives that will be reviewed by the Board. The CITRB ensures reviewed IT investments have an acceptable IT acquisition strategy, a viable technical approach, a risk plan, and an acceptable business case. A CITRB provides approval or disapproval by the DOC CIO of requests for ITIAs and the AP. A formal memo with the ITIA decision will be issued at the completion of the review. In lieu of a CITRB, the DOC CIO may convene with bureaus to determine the specific review process for acquisitions below $100M based on acquisition complexity, risk, priority, and technology.

[03] Information Technology:

Any services or equipment, or interconnected system(s) or subsystem(s) of equipment, that are used in the automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information by the agency; where such services or equipment are 'used by an agency' if used by the agency directly or if used by a contractor under a contract with the agency that requires either use of the services or equipment or requires use of the services or equipment to a significant extent in the performance of a service or the furnishing of a product.*

The term "information technology" includes computers, ancillary equipment (including imaging peripherals, input, output, and storage devices necessary for security and surveillance),

peripheral equipment designed to be controlled by the central processing unit of a computer, software, firmware and similar procedures, services (including provisioned services such as cloud computing and support services that support any point of the lifecycle of the equipment or service), and related resources.

The term "information technology" does not include any equipment that is acquired by a contractor incidental to a contract that does not require use of the equipment.

*IT may be embedded in the platform or environment being acquired (for example: aircraft, ships, facilities, sensors, and instrumentation).

[04] Information Technology Investment Authority:

The approval required at the appropriate level for all acquisitions which include or contain IT, as set forth in the NOAA Policy on IT Acquisition Strategies and Planning under FITARA. The ITIA must have an assigned ITIA number (this is not the same as an IRD number), which complies with the OCIO numbering convention.

An ITIA is the (A)CIO's certification of a valid IT requirement and a recommendation for an acquisition strategy, which ensures that acquisitions that include IT:

- Align with one or more of:
    o DOC Strategic Plan;
    o NOAA Strategic Plan;
    o NOAA IRM Plan;
    o Line Office Strategic Plan;
    o Mission and program objectives;
- Align with DOC and NOAA Enterprise Architecture;
- Are led by appropriate Federal Acquisition Certifications (FACs), including specialized IT certifications as appropriate;
- Present opportunities to leverage acquisition initiatives such as shared services, category management, strategic sourcing, and incremental or modular contracting and use such approaches as appropriate;
- Contain appropriate IT related portions of statement of needs or statement of work;
- Manage project risks;
- Manage cybersecurity risks;
- implement incremental development adequately; and
- Contain appropriate cost estimates.

[05] Information Resource Management Advisory Committee:

Chaired (or co-chaired) by a delegated (A)CIO, each LO/SO IRMAC (or equivalent LO-level board, committee, or council) provides: (A) a high level technical advisory function; (B) information exchange related to the implementation and execution of IT policy and related activities; (C) decision making related to IT procurements; and (D) enterprise and

business-level planning. SO/LO IRMACs will incorporate the [NOAA IRM Strategic Plan](#), [NOAA Enterprise Network Services Strategic Plan](#), [NOAA Enterprise IT Services Catalog](#), [NOAA Geospatial Strategic Plan](#), [NOAA High Performance Computing Strategic Plan](#), [NOAA Cyber Security Roadmap](#), [EA Alignment Tool](#), [IT Security Checklist](#), and [Section 508 Standards Checklist](#), into their review of IT acquisitions. The IRMAC will provide advice and recommendations to the (A)CIO on ITIAs for reviewed IT acquisitions. The primary role of the IRMAC is to determine whether or not an acquisition involves IT and if so, the value of that IT.

[06] Investment Review Determination:

The IRMAC review will result in an indication as to whether the acquisition is determined to either be non-IT or include the procurement of IT products or services. The IRD, or equivalent, will serve as guidance to the CO or PM as to whether the procurement includes IT and whether a new ITIA is required or an existing ITIA is applicable. All IRDs, or equivalent, must have an assigned IRD number (this is not the same as an ITIA number) in accordance with [NOAA OCIO numbering convention](#).

[07] [Milestone Acquisition Plan](#):

A MAP identifies acquisition objectives and outlines the actions, milestones, and documents (including the applicable NOAA ITIA) required to meet the acquisition.

XII. Approval

This policy was approved by the NOAA CIO and will be effective immediately for implementation of all FY19 (and onward) acquisitions. After six months of full implementation beginning October 1, 2018, it will be renewed by the CIO Council.

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Zachary G. Goldstein, Chief Information Officer

XIII. Appendices

[01] [FITARA Process Flow Diagram for IT Procurements](#)

[02] [ITIA Briefing Template](#)

[03] [ITIA Memorandum Template and Example](#)

[04] ITIA Examples: [NOAA/NWS ASOS SLEP ITIA (10/2/17)](#) and [NOAA/OAR ESRL ITIA (12/8/17)](#)

[05] MAP Example: [FY17 Milestone Acquisition Plan (after award) - Cloud Access Security Broker](#)

[06] [Matrix of Required AGO Acquisition Templates](#)