

March 13, 2019

Ms. Suzette Kent
Federal Chief Information Officer
Executive Office of the President
1650 Pennsylvania Avenue, NW
Washington, DC 20502

The Honorable Emily Murphy
Administrator
U.S. General Services Administration
1800 F Street, NW
Washington, DC 20006

Dear Ms. Kent and Ms. Murphy:

The Professional Services Council (PSC)¹ respectfully asks that the Office of Management and Budget (OMB) and the General Services Administration (GSA) continue to accelerate federal adoption of secure cloud technologies and improve agencies' use of Federal Risk and Authorization Management Program (FedRAMP) authorizations.

Specifically, we request that OMB work to improve the acceptance and reciprocal treatment of FedRAMP's Authority to Operate (ATO) and Provisional Authority to Operate (P-ATO) certifications. To achieve the "do once, use many times" model envisioned by FedRAMP, we request that OMB issue a memorandum directing agencies to rely on cloud service providers' (CSPs') existing certifications, accreditations, and audit work when a joint or leveraged authorization is not accepted by the agency.

America is the world leader in cloud computing, yet our government lags behind the private sector when it comes to leveraging cloud-based technologies. As the overall shift to buying technologies "as a service" continues, federal agencies risk falling even further behind how leading private sector organizations operate.

There must be robust controls to ensure the security of federal IT systems against relentless cyberattacks. However, some aspects of the current authority to operate (ATO) process hinder agencies' access to cloud computing and other state of the art tools that it enables. Accelerating the security authorization process is essential for bringing more innovation into government and achieving the President's Management Agenda goals for IT modernization and leveraging data as a strategic resource.

¹ PSC's member companies represent small, medium, and large businesses that provide civilian agencies and the military with services of all kinds, including cloud computing products and services.

FedRAMP already provides an important government-wide, standardized approach to security for cloud products and services. PSC believes that the FedRAMP authorization process can continue to be streamlined through efforts such as the FedRAMP Tailored initiative, and accelerated by applying new technologies, such as artificial intelligence, machine learning and robotics process automation tools for certification and compliance monitoring. The “FAST Lane” pilot, which drastically reduced Schedule 70 approval times for IT vendors, is one example where GSA has already successfully leveraged such tools to make it easier for companies to do business with government.²

OMB guidance already encourages agencies to use joint and leveraged authorizations whenever possible.³ Yet once companies have successfully gone through the FedRAMP process, they cannot always reuse their ATOs with multiple federal agency customers as envisioned by FedRAMP’s “do once, use many times” approach. An agency is under no obligation to accept a FedRAMP authorization. For example, even though the Department of Defense (DoD) participates in the FedRAMP Joint Authorization Board (JAB), a vendor’s ATO from the JAB is no guarantee that other DoD agencies will accept its authorized cloud services. Some DoD agencies may not even provide reciprocal treatment for an authorization issued by another DoD entity.

PSC therefore urges OMB to take further action to ensure agencies accept existing certification and accreditation, including artifacts and other documentation of cloud service providers’ security conducted by another federal agency or an accredited third-party assessment organization (3PAO). This would remove barriers for companies seeking to offer cloud products and services to government. It would also reduce wasteful, duplicative authorization work by agencies.

Thank you for your consideration. PSC would welcome the opportunity to provide additional details to OMB and GSA, as well as policymakers across government, at your convenience. Should you have any questions, please feel free to contact me at chvotkin@pscouncil.org or (703) 875-8059.

Sincerely,



Alan Chvotkin
Executive Vice President and Counsel

cc: Mr. Alan Thomas, Commissioner, Federal Acquisition Service, GSA
Mr. Anil Cheriyan, Deputy Commissioner, Federal Acquisition Service, GSA
Ms. Ashley Mahan, Director (Acting), Secure Cloud Portfolio & FedRAMP, GSA

² see: Ely, Kay. “GSA Making it Easier with new FAST Lane for IT.” GSA Blog. Apr. 13, 2016. *available at:* <https://www.gsa.gov/blog/2016/04/13/GSA-Making-it-Easier-with-new-FAST-Lane-for-IT>

³ see: OMB A-130 Revised, “Managing Federal Information as a Strategic Resource.” July 28, 2016, p59.