

Interim Policy on Complying with the Federal Information Technology Acquisition Reform Act (FITARA)

1. **PURPOSE:** This notice and attachment establishes the Department of Veterans Affairs (VA) interim FITARA policy. Under FITARA, all information technology (IT) acquisition capabilities and investments are subject to specific review requirements, regardless of dollar value, funding authority, funding source, or other considerations. Items used in the treatments of patients such as medical devices, as defined by the Food and Drug Administration; Direct Medical (diagnostic or treatment) Systems, Equipment or Devices (DMSED) which meet the FDA definitions of a Medical Device or Commercial Off-the-Shelf (COTS) for Direct Patient Care that have an IT/IT-related Product Service Code must comply with this FITARA policy. This policy complements VA Directive 6008, which establishes policy regarding funding of IT acquisitions. Except for the VA Office of the Inspector General, there are no VA Administration or Staff Office exceptions.
2. With respect to the Office of the Inspector General (OIG), VA will seek to implement this plan in a mutually-agreeable manner that neither impacts the independence of those offices and the authorities Inspectors General have over the personnel, performance, procurement, and budget of the OIG, as provided in the Inspector General Act of 1978, as amended (5 U.S.C. App 3), nor violates the statutory requirements established by FITARA relative to all IT/IT-related procurements. The exception for VA OIG to develop an agreed upon process will be completed in FY 2021.
3. **POLICY:**
 - a. Under FITARA, the Chief Information Officer (CIO) is responsible for accountability, oversight, and visibility of all IT and IT-related acquisitions, regardless of funding source. The CIO has appointed individuals to act as designated representatives to review proposed IT acquisitions strategies/plans and has established review thresholds based on the estimated Total Contract Lifecycle Costs. CIO-designated reviewers/approvers will review each proposed IT acquisition strategy/plan prior to contract solicitation and contract award for the following:
 - (1) Appropriateness of contract type;
 - (2) Program office need date;
 - (3) Appropriateness of IT and IT-related portions of statement of work;
 - (4) Alignment to the mission and business objectives supported by the IT Strategic Plan;
 - (5) Consultation with program office leadership as required by FITARA;
 - (6) Risk and mitigation strategies, and

- (7) Compliance with the Capital Planning and Investment Control Process (OMB Circular A-130).
- b. Per OMB Memorandum M-15-14, Oversight of Federal Information Technology, IT and IT-related acquisitions include any services or equipment, 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, whether used directly by the agency or by a contractor.
 - c. 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 or similar products, 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.
 - d. For specific procedures, please refer to the FITARA Acquisition Compliance Standard Operating Procedures (SOP) document attached.
 - e. For a list of IT/IT-related Specialized Product Service Codes, please see Appendix B of the attached SOP.
4. **RESPONSIBLE OFFICE:** Office of Strategic Sourcing, Office of Information and Technology (005G).
5. **EFFECTIVE DATE:** These policy changes are effective immediately and will be fully implemented into the Department no later than the 4th Quarter, Fiscal Year 2020. These procedures are interim. A more definitive VA Directive will be issued in Fiscal Year 2021.

CERTIFIED BY:

**BY DIRECTION OF THE SECRETARY
OF VETERANS AFFAIRS:**

/s/
Karen L. Brazell
Principal Executive Director, Office of
Acquisition, Logistics and Construction
and Chief Acquisition Officer, and Acting
Assistant Secretary for Enterprise
Integration

/s/
James P. Gfrerer
Assistant Secretary for Information and
Technology and Chief Information
Officer

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INFORMATION
AND TECHNOLOGY

Federal Information Technology Acquisition Reform Act: Acquisition Compliance

Standard Operating Procedure

August 2020 | Office of Strategic Sourcing

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VA



U.S. Department of Veterans Affairs
Office of Information and Technology

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Background

The Department of Veterans Affairs (VA) is committed to improving the management and performance of its Information Technology (IT)¹/IT-related² acquisitions. This commitment ensures the Department's and ultimately the Chief Information Officer's (CIO) accountability, visibility and oversight of IT capabilities and investments, regardless of the funding source, and in compliance with the Federal Information Technology Acquisition Reform Act (FITARA). FITARA was enacted by Congress on December 19, 2014, to modernize and strengthen federal IT capabilities while addressing the following challenges: duplicative spending, poor cost performance of IT investments, lack of IT spending visibility and the inability to benchmark IT spending within federal agencies.

Adherence with FITARA is mandated and will significantly increase the CIO's accountability and visibility into total Agency IT/IT-related acquisitions. Additionally, it will enable VA to align IT capabilities with the Department's mission and requirements, provide transparency across the agency and programs, and reduce duplication in the VA's IT investment portfolio.

Policy

As part of the FITARA legislation, the Office of Management and Budget (OMB) issued Memorandum M-15-14, "Management and Oversight of Federal Information Technology" on June 10, 2015, to provide guidance to agencies for implementation of FITARA and related IT management practices.

In conjunction with this Standard Operating Procedure (SOP), VA developed a Notice "Interim Policy on Complying with the Federal Information Technology FITARA", which states, "The CIO retains accountability of all IT/IT-related capabilities regardless of funding source and dollar amount." The CIO will achieve FITARA compliance by utilizing methodologies that include but are not limited to governance processes and IT acquisition/contract reviews based on estimated total contract lifecycle cost. The CIO will identify and approve designated officials by position and in writing to efficiently execute the approval of IT/IT-related acquisition strategies and plans, which is outlined in the CIO Assignment Plan.

The intent of this SOP is to outline the procedures and guidelines necessary to have IT/IT-related acquisition strategies and acquisition plans FITARA approved and reviewed in accordance with OMB's FITARA guidance. To ensure OMB's FITARA guidance is executed, VA will henceforth require FITARA review and approval of IT/IT-related acquisition strategies and acquisition plans prior to solicitation and contract award.

¹ IT references all requirements/acquisitions funded with congressionally managed IT funds.

² IT – related references all requirements/acquisitions funded outside of the congressionally managed IT budget, identified under OMB's Specialized Information Technology and Telecommunications Product Service Codes, Appendix B, regardless of dollar amount and includes interagency acquisitions of IT/IT-related requirements.



Applicability

OMB Memorandum M-15-14. OMB M-15-14 defines Information Technology Resources as:

- » 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 either use of the services or equipment.
- » 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.

VA's Office of Information Technology (OIT) has adopted the OMB definition outlined above and clarified that "IT" includes all acquisitions funded with Congressionally appropriated. IT funds. IT-related includes all acquisitions funded outside of the Congressionally appropriated IT budget identified under OMB's Specialized Information Technology and Telecommunications Product Service Codes, regardless of dollar amount; it also includes interagency acquisitions. This SOP applies to all VA Administrations and Staff Offices executing IT/IT-related acquisitions regardless of funding source.

What requires FITARA compliance:

1. FITARA compliance is required for all IT/IT-related requirements.
2. Items used in the treatments of patients such as medical devices, as defined by the Food and Drug Administration; Direct Medical (diagnostic or treatment) Systems, Equipment or Devices (DMSED) which meet the FDA definitions of a Medical Device or Commercial Off-the-Shelf (COTS) for Direct Patient Care use that has an IT/IT-related Product Service Code must comply with FITARA compliance and submit requirements in the Budget Tracking Tool (BTT) Acquisition Review Module.
3. IT/IT-related micro-purchases made with a government-wide purchase card

Medical devices and clinical systems as defined by the Food and Drug Administration (FDA), as well as special purpose systems not utilizing a Specialized Information Technology and Telecommunications Product Service Codes are exempt at this time.



Additionally, IT/IT-related equipment purchases made specifically for Veterans under the Vocational Rehabilitation and Employment (VR&E) that do not access the VA Network are exempt from FITARA.

With respect to Office of Inspector General (OIG), VA will seek to implement this plan in a mutually-agreeable manner that neither impacts the independence of those offices and the authorities Inspectors General have over the personnel, performance, procurement, and budget of the OIG, as provided in the Inspector General Act of 1978, as amended (5 U.S.C. App 3), nor violates the statutory requirements established by FITARA relative to all IT/IT-related procurements. An exemption for VA OIG will be determined in FY 2021.

Roles and Responsibilities

This SOP assigns roles and responsibilities to appropriate stakeholders for defining requirements, planning acquisitions, and executing procurements for IT/IT-related products and services across VA.

- » Chief Information Officer (CIO) Responsibilities: The CIO is responsible for defining the IT Strategic Plan and objectives of the organization and aligning all IT capabilities to the larger VA strategic objectives. The CIO is responsible for the accountability and visibility of all IT/IT-related requirements. In conjunction with the Chief Acquisition Officer (CAO), the CIO is responsible for reviewing and approving all IT acquisition strategies and IT acquisition plans prior to solicitation and contract award. In accordance with OMB guidance, the CIO shall primarily consider the following factors when reviewing acquisition strategies or acquisition plans: appropriateness of contract type; program office need date; appropriateness of IT/IT-related portions of the statement of work; alignment to the VA mission and consistent with business objectives supported by the IT Strategic Plan; in consultation with program office leadership as required by FITARA. The CIO is advised by the Chief Data Officer and the Chief Data Technology officer on investments related to data, information sharing and analytics.
- » Chief Acquisition Officer (CAO) Responsibilities: The CAO³ shall perform the duties outlined in OMB M-15-14, Management and Oversight of Federal Information Technology, as it relates to the execution of FITARA. The CAO is responsible for ensuring that contract actions including IT/IT-related requirements are consistent with CIO-approved acquisition strategies and plans. The CAO, through the Senior Procurement Executive (SPE), ensures VA's acquisition workforce is trained and certified at the appropriate level (FAC-C, FAC-P/PM, or FAC-COR) and in full compliance with Department- and government-wide policies, to include continuing education to maintain certifications. VA uses the Federal Acquisition Institute Training Application System (FAITAS) to track all acquisition workforce certifications. The CAO, in consultation with the CIO and, where appropriate, the Chief Financial Officer (CFO), is responsible for instituting a Department-wide process to ensure that all IT/IT-related acquisitions are led by personnel with appropriate federal acquisition certifications; that they are reviewed for opportunities to leverage acquisition initiatives; that they are

³ For the purposes of this document, CAO includes CAO-approved designated officials



supported by cost estimates that have been reviewed by the CIO; and that they adequately implement agile methodologies.

- » CXO Council: The CXO Council is responsible for reviewing enterprise IT requirements and prioritizing them in accordance with a fiduciary responsibility to the budget, the strategic goals and objectives of the Agency, and the Secretary's priorities. The CXO Council operates in accordance with the rules outlined in its charter and makes decisions and recommendations to the VA Operations Board on a balanced portfolio of requirements that includes full visibility into the benefits and costs associated with each IT requirement.
- » CIO Governance Oversight Responsibilities: The CIO exercises oversight over the entire IT Governance Framework and is the chair of the IT Governance Board (ITGB). The CIO, through the ITGB, has direct oversight responsibility for all IT acquisitions, the IT Vision, and development of the IT Strategic Plan. The IT Governance Framework consists of one IT Governance Board, three Councils and nine Committees which all support Strategic oversight of the entire IT Enterprise. The ITGB, on a quarterly basis, will operate as a VA Stakeholders Forum. The Forum will provide all VA Administrations and Staff Offices the opportunity to review and provide the CIO an overview of their IT/IT-related acquisition requirements regardless of funding source or dollar amount.
- » VA Budget Officials Responsibilities: VA Budget Officials are responsible for developing budget requests during the budget formulation process that fully describe the costs and benefits of various funding levels. They are also responsible for properly executing funding available during the year of budget execution. During the budget formulation and execution processes, VA Budget Officials shall identify IT capabilities/requirements that will be funded outside of the OIT appropriations and ensure the VA CIO is aware of such requirements.
- » Requiring Activity Responsibilities: Requiring activity responsibilities shall apply to all Administrations and Staff Offices within the Department of Veterans Affairs that intend to make an IT/IT-related acquisition, regardless of funding source. The requiring activity is responsible for identifying requirements for the upcoming fiscal year and ensuring that requirements align to the VA or IT Strategic Plan, as applicable. The requiring activity shall also ensure review of any IT/IT-related requirements for FITARA compliance. Additionally, the requiring activity is responsible for populating requirements into the Acquisition Review Module (ARM) in the Budget Tracking Tool (BTT) which is further discussed below. The requiring activity, in collaboration with OIT's Office of Strategic Sourcing Service (OSS) Acquisition Category Management Directorate, will assess and leverage current acquisition initiatives and enterprise vehicles where possible.
- » Contracting Activity Responsibilities: The contracting activity is responsible for collaborating with the requiring activity on acquisition planning activities. A Contracting Officer (CO) may not enter into a contract or other agreement for IT/IT-related products or services unless an acquisition strategy or acquisition plan has been reviewed and approved by the VA CIO or the CIO's approval designated official. Contracting activities will work with their customers to ensure IT/IT-related requirements are submitted for appropriate FITARA review and approval prior to issuance of solicitation and contract award.
- » IT Office of Strategic Sourcing (OSS) Responsibilities: OSS is responsible for managing FITARA compliance processes and procedures for IT/IT-related requirements for the Department. This process will include a review of contract awards and obligations using IT/IT related PSCs,



North American Industry Classification System (NAICS) and keywords. OSS will identify actions for consolidation of IT/IT-related opportunities, where appropriate, in conjunction with the requiring activity.

- » Upon maturation of this process, OSS Acquisition Category Management will conduct an enterprise spend analysis to identify and prioritize categories of IT spending. This process will ensure that requirements are efficiently procured in accordance with OMB Memorandum M-19-13, “Category Management: Making Smarter Use of Common Contract Solutions and Practices”. As part of the technical review process, OSS Acquisition Category Management, will review individual requirements containing IT/IT-related acquisitions in completed BTT entries to assess and determine if the requirements can be met through alternative contract strategies.

Budget Tracking Tool (BTT)

The Budget Tracking Tool (BTT) provides a standardized, automated method of budget management and execution across a diverse group of organizations and accounting activities. BTT was designed to create initial operating plans and to track yearly budget execution. Acquisition Review Module (ARM) is housed within the Budget Tracking Tool (BTT).

Acquisition Review Module (ARM)

The Acquisition Review Module (ARM) is a tool that resides within BTT to facilitate FITARA review and approval. ARM combines acquisition, budget, and technical reviews into a streamlined process that expands CIO visibility and accountability into IT/IT-related requirements across the Department.

CIO’s Visibility into IT/IT-Related Requirements

The CIO utilizes the governance process for insight into all known IT/IT-related requirements from an Agency perspective. Quarterly, the CIO will review IT/IT-related requirements entered in the ARM Module of BTT. VA Administrations and Staff Offices will participate in the governance process as part of the VA Stakeholders Forum. This review will provide the CIO insight, accountability and visibility into all known IT/IT-related requirements for the Department regardless of funding source and funding threshold levels. The information reviewed will be based on a report generated from the ARM fields annotated in Table 1 titled “Required Acquisition Review Module (ARM) Fields in the Budget Tracking Tool (BTT)” as identified in this document.

FITARA Acquisition Review Module (ARM) Process

OSS is responsible for ensuring compliance with the FITARA acquisition approval process. The ARM process is mapped out in the Process Asset Library (PAL). The following paragraphs provide an overview of the FITARA acquisition approval process.

Step 1: Identify Requirements. The Requiring Activity identifies requirements and ensures the requirements align with the approved VA Strategic Plan and/or the approved IT Strategic Goals and Objectives.

Step 2: Conduct Budget Concurrence. Requiring activities must provide funding documents (such as VA Form 2237, or a budget memo) signed by their budget officials as part of their requirement submission in BTT

Step 3: Populate Requirements in BTT. The ARM Requestors from all VA Administrations and Staff Offices will enter the following data into the ARM module of BTT for all IT/IT-related requirements.

NOTE: Table 1 contains the required ARM fields in BTT. For more information about how to use BTT and ARM, please see the [BTT User Guide](#).

Table 1 - Required Acquisition Review Module (ARM) Fields in BTT

Required BTT Field	Field Description
Acquisition Identifier Number*	Identifies the Year of Execution, Funding Organization, Requiring Activity, and ARM Number
Title*	Title of Requirements
Funding Source*	Planned Source of Funding
Description of Acquisition*	Short Narrative to include (but not limited to) the following: Brief Description of the Requirement (examples of data): Description of the Supplies or Services being Procured to include Statement of Need Alignment to strategic objectives (e.g., VA Digital Transformation Strategy) Legislation Impact: If any identify if this Requirement is directly tied to a Legislative Mandate
Acquisition Action*	Select from dropdown. Type of Acquisition Action (e.g., New Contract, New Task/Delivery Order, Option)
Procurement Classification*	Information Technology or IT-related
Type of Acquisition*	Select from dropdown. Type of Acquisition (Aligned to GSA IT Categories)
Acquisition Category*	Select from dropdown. Type of Acquisition Category (Aligned to Type of Acquisition Sub-Categories)
Product Service Code*	Product Service Code (PSC) aligned with Acquisition Category (for a full list of IT specialized PSCs see Appendix B)
Program Need Date*	Target Date of Contract Award



Estimated Total Contract Amount *	Estimated Total Contract Lifecycle Costs (Base plus all available option periods)
Estimated Action Amount*	Current Year Anticipated Obligation Amount
Contracting Office	Contracting Office assigned to requesting activity
In VIP	Determination if the requirement was submitted in the Veteran-Focus Integration Process (VIP).
Current Contract Action Period of Performance	Current Contract Action Period of Performance dates
PM Email	Email address of Project Manager
Requisition Package POC Email*	Email address of Point of Contact (POC) for Requisition Package

* Denotes fields utilized in the VA Quarterly Stakeholders Review Forum.

Step 4: Process ARM Request. The ARM Requestor completes the ARM fields in Table 1 above and uploads the current required documents (e.g., Product Description (PD), Performance Work Statement (PWS), Statement of Objectives (SOO) and Independent Government Cost Estimate (IGCE) in the tool. The request will go through the management quality and technical review in BTT.

NOTE: The below link provides detailed instructions of the ARM process and the various ARM user roles https://vaww.oed.wss.va.gov/process/maps/process_ARM.pdf

Step 5: Conduct Initial FITARA Review

The initial FITARA review is conducted to obtain approval from requiring activity leadership in accordance with the review levels listed below, before collaborating with the appropriate contracting activity.

- » For estimated Total Contract Lifecycle Costs less than or equal to \$1 million, the Director or equivalent of the requiring activity.
- » For estimated Total Contract Lifecycle Costs greater than \$1 million but less than or equal to \$5 million, the Executive Director or equivalent of the requiring activity.
- » For estimated Total Contract Lifecycle Costs greater than \$5 million but less than \$15 million, the Deputy Assistant Secretary (DAS)/Deputy Chief Information Officer (DCIO) or equivalent of the requiring activity.
- » For estimated Total Contract Lifecycle Costs equal to or greater than \$15 million, the Chief Information Officer will conduct the Initial FITARA Review in BTT. Requirements at this level must be approved by the Department CIO. Contracts valued at \$15 million or more require a briefing with the CIO prior to completing the next steps. Contact OSS Acquisition Compliance



Management Team at ciofitarareviews@va.gov to coordinate FITARA CIO review scheduling and to receive templates.

Step 6: Finalize Acquisition Documents

Once the Initial FITARA review is complete, the requiring activity will submit a requirement package to the appropriate contracting activity. The contracting activity will review and refine draft documents in collaboration with the requiring activity to develop the acquisition strategy and other acquisition documents.

Step 7: Conduct FITARA Approval

Once the contracting activity refines the acquisition documents and develops the acquisition strategy, the contracting activity will provide the final acquisition documents to the ARM requestor. The ARM requestor will upload the acquisition strategy, included in the final acquisition documents, into ARM for the FITARA approval. The FITARA approver (may be the same as the Initial FITARA approver in step 5), will review the acquisition strategy document signed by the contracting officer and conduct the FITARA approval. Table 2 identifies the acquisition strategy documents by acquisition action.

Table 2 - Required Acquisition Strategy Documents by Acquisition Activity

Acquisition Action	Acquisition Strategy Documents (signed by the Contracting Officer)
Task/Delivery Order (Internal IDIQ) – e.g. T4NG	Market Research memo
Task/Delivery Order (External IDIQ) – e.g. NASA SEWP, GSA FSS	Under \$7 million – Market Research memo At or Over \$7 million – Acquisition Plan
New Contract	Under \$7 million – Market Research memo At or Over \$7 million – Acquisition Plan
Interagency Acquisition (IAA) Part B	Market Research Memo
Options	Market Research Memo or Acquisition Plan
Modifications	Within Scope Memo or Justification & Approval (J&A) (for new work)

Step 8: Submit ARM approval

The ARM Approval Document is generated at the end of the process and provides a summary record of FITARA approval. Upon receipt of FITARA approval, the requiring activity submits it to the appropriate contracting activity, and the contracting activity can proceed with the acquisition process.

Step 9: FITARA Amendment Requirement. If the anticipated or awarded contract amount exceeds the approved ARM amount by 10% or more, or changes the FITARA threshold level, an amendment and a new FITARA approval are required.

Step 10: Submit FITARA Amendment Request. An Amendment Request must include a justification. The ARM Requestor will then adjust the estimated Total Contract Lifecycle Cost and update all necessary documents in ARM and resubmit the request for FITARA approval.



FITARA Acquisition Compliance SOP Points of Contact

For access to BTT follow this link: <https://btt.dva.va.gov/>

For assistance or questions related to BTT, contact the BTT Help Desk:

<https://btt.dva.va.gov/ppServlet/spring/helpDesk/helpDeskRequest.jsp> or 703-707-2706.

To access the process maps follow this link to PAL:

https://vaww.oed.wss.va.gov/process/maps/process_ARM.pdf.

For questions related to the FITARA process, contact OIT's Office of Strategic Sourcing (OSS) at askstrategicsourcing@va.gov or 202-461-6740 for assistance.

Additional Resources

To obtain information on FAQs and a list of ARM reviewers go to:

<https://vaww.oit.va.gov/services/arm/>.

References

- » OMB Memorandum (M-15-14), Management and Oversight of Federal Information Technology
- » OMB Memorandum (M-19-13), Category Management: Making Smarter Use of Common Contract Solutions and Practices (March 2019)
- » VA Notice 19-XX: Interim Policy on Complying with the Federal Information Technology Acquisition Reform Act (FITARA), (Month, Year)
- » VA Directive 6008, Acquisition and Management of VA Information Technology Resources
- » VA Directive 6550, Pre-Procurement Assessment for Medical Device/Systems
- » VA Fiscal Year (FY) 2018-2024 Strategic Plan
- » VA FY 2018 - 2024 Information Resource Management Strategic Plan
- » VA Handbook 6500.6, Contract Security

Effective Date

The projected effective date for the Standard Operating Procedure is the third quarter of Fiscal Year 2020 and is due for review no later than two years after the effective date.

Distribution:

Veterans Health Administration (10)
Veterans Benefits Administration (20)
Veterans Experience Office (30)
National Cemetery Administration (40)
Office of Inspector General (50)
Office of Public and Intergovernmental Affairs (002)
Office of Acquisition Logistics and Construction (003)
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Office of Congressional and Legislative Affairs (009)
Board of Veterans Appeal (01)
Office of General Counsel (02)
Veterans Service Organization Liaison (00C)
Office of Small and Disadvantaged Business Utilization (00SB)

Attachments:

Appendix A - Glossary
Appendix B - IT/IT-related Product Service Codes with descriptions
Appendix C - FITARA Review and Approval Checklist
Appendix D - ARM Approval Document (Sample)
Appendix E - FITARA Approval Briefing Template

Appendix A: Glossary

Key Terms and Definitions

ARM Requestor: This role ensures required data entries are complete in all fields, uploads documentation needed for processing, submits the requirement package for review, and submits an Amendment Request if required. The role is generally a representative from the requiring activity that owns the requirement or needs the product or service (e.g. Contracting Officer Representative (COR) of the contract).

Chief Information Officer Approved Designated Official: Person designated, in writing by position, that will approve any IT/IT-related acquisition strategies and acquisition plans before contracting officer enters into a contract or agreement for IT/IT-related requirements.

Contracting Activity: Office which facilitates acquisition activities in support of requiring activities and includes all contracting officers across all VA Administrations and Staff Offices.

Deputy Assistant Secretary (DAS)/Deputy Chief Information Officer (DCIO) or equivalent: FITARA reviewer for packages where the estimated Total Contract Lifecycle Cost for the requirement is greater than \$5 million and less than \$15 million.

Director or equivalent: Serves as the CIO's approved designated officials in performing FITARA reviews for packages where the estimated Total Contract Lifecycle Cost for the requirement action is less than or equal to \$1 million.

Executive Director or equivalent: Serves as the CIO's approved designated officials in performing FITARA reviews for packages where the estimated Total Contract Lifecycle Cost for the requirement greater than \$1 million and less than or equal to \$5 million.

FITARA Reviewer/Proxy: The FITARA Reviewer serves as the CIO delegate based on the appropriate FITARA threshold levels and validates the program and acquisition strategies. The Proxy serves as the assistant to the FITARA Reviewer. The FITARA Reviewer and Proxy role must be designated by the CIO in writing.

IT-Related: All requirements/acquisitions funded outside of the congressionally managed IT budget, identified under OMB's Specialized Information Technology and Telecommunications Product Service Codes.

IT Acquisition: OMB M-15-14, Management and Oversight of Federal Information Technology implementation guidance defines Information Technology (IT) spending as including any of the following:

- » 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 Department; where such services or equipment are 'used by a Department' if used by the Department directly or if used by a contractor under a contract with the Department 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 contract cost of the equipment or service), and related resources.
- » The term “information technology” as defined for FITARA does not include any equipment that is acquired or owned by a contractor incidental to a contract that does not require use of the equipment for VA purposes.

Management Quality and Control Reviewer: This role serves as a “second set of eyes” and reviews the requirement package to ensure that all data entries, documentation, and funding allocations are validated for quality and accuracy. Ensures that the required documents are free of track changes with no comments or markings. Additionally, ensures all information submitted in the requirement package is constant. The role is a representative from the requiring activity that owns the requirement or needs the product or service (e.g. Project/Program Manager of the contract).

Medical Devices/Clinical System: A medical device/system is defined as any device or system that meets any of the following requirements:

- » The device is used in patient healthcare for diagnosis, treatment (therapeutic), or physiological monitoring of patients. This includes server-based medical equipment and clinical systems. Examples of medical devices/systems include, but is not limited to, physiological monitoring systems, ventilators, infusion pumps, Computed Tomography (CT) scanners, Medical Unified Simulation Environment (MUSE) cardiology information system, Picture Archiving and Communication Systems (PACS), Clinical Information Systems (CIS), and laboratory analyzers. Medical devices directly connect to the patient; process human and other biologic specimens; create medical images, display electrophysiological waveforms; obtain physiologic measurements, or directly perform therapeutic-support to the patient.
- » The device/system has gone through the Food and Drug Administration’s (FDA) Premarket Review or 510k Process.
- » The device is incorporated as part of a medical device system in such a fashion that if modified, the device or system component could have a negative impact on the functionality or safety of the main medical device/system.

Quarterly VA Stakeholders Forum: VA Executive Leadership from the VA Administrations and Staff Offices will provide the VA CIO a quarterly briefing on their IT/IT- related acquisitions. The briefing will provide information populated from the BTT per Table 1- Required ARM Fields.

Requiring Activity: Any office within the Department of Veterans of Affairs (VA) with identified requirements and a plan to acquire IT/IT-related products and/or services.



Special Purpose Systems: Special purpose systems are defined as a network-connected, non-medical systems that do not have the standard VA baseline configuration. These systems play a vital role in supporting VA facilities organizational mission. Special purpose systems are involved in maintaining and supporting the infrastructure, safety and/or security systems, and environmental controls at VA facilities.

Technical Reviewer: This role is a designated OIT representative. The reviewers ensure the requirement package meets VA's requirements for Infrastructure Operations, Security Oversight and Compliance, and Solution Delivery. Ensures all software on the VA network is Technical Reference Model (TRM) approved and is safe to be on the VA network. Additionally, collaborates with the VA Enterprise Cloud (VAEC) team for cloud requirements and the Project Special Forces (PSF) team for SaaS requirements.



Appendix B: IT/IT-related Specialized Product Service Codes with Descriptions

The IT Product Service Codes (PSC) listed below require FITARA approval.

Four-Digit PSC	PSC Code (Description)
D301	IT AND TELECOM- FACILITY OPERATION AND MAINTENANCE
D302	IT AND TELECOM- SYSTEMS DEVELOPMENT
D303	IT AND TELECOM- DATA ENTRY
D304	IT AND TELECOM- TELECOMMUNICATIONS AND TRANSMISSION
D305	IT AND TELECOM - TELEPROCESSING, TIMESHARE, AND HIGH-PERFORMANCE CLOUD COMPUTING
D306	IT AND TELECOM- SYSTEMS ANALYSIS
D307	IT AND TELECOM- IT STRATEGY AND ARCHITECTURE
D308	IT AND TELECOM- PROGRAMMING
D309	IT AND TELECOM- INFORMATION AND DATA BROADCASTING OR DATA DISTRIBUTION
D310	IT AND TELECOM- CYBER SECURITY AND DATA BACKUP
D311	IT AND TELECOM- DATA CONVERSION
D312	IT AND TELECOM- OPTICAL SCANNING
D313	IT AND TELECOM- COMPUTER AIDED DESIGN/COMPUTER AIDED MANUFACTURING (CAD/CAM)
D314	IT AND TELECOM- SYSTEM ACQUISITION SUPPORT
D315	IT AND TELECOM- DIGITIZING
D316	IT AND TELECOM- TELECOMMUNICATIONS NETWORK MANAGEMENT
D317	IT AND TELECOM- WEB-BASED SUBSCRIPTION
D318	IT AND TELECOM- INTEGRATED HARDWARE/SOFTWARE/SERVICES SOLUTIONS, PREDOMINANTLY SERVICES
D319	IT AND TELECOM- ANNUAL SOFTWARE MAINTENANCE SERVICE PLANS
D320	IT AND TELECOM- ANNUAL HARDWARE MAINTENANCE SERVICE PLANS
D321	IT AND TELECOM- HELP DESK
D322	IT AND TELECOM- INTERNET
D324	IT AND TELECOM- BUSINESS CONTINUITY
D325	IT AND TELECOM- DATA CENTERS AND STORAGE
D399	IT AND TELECOM- OTHER IT AND TELECOMMUNICATIONS
H170	QUALITY CONTROL- ADP EQUIPMENT/SOFTWARE/SUPPLIES/SUPPORT EQUIPMENT
H970	OTHER QC/TEST/INSPECT- ADP EQUIPMENT/SOFTWARE/SUPPLIES/SUPPORT EQUIPMENT
J058	MAINT/REPAIR/REBUILD OF EQUIPMENT- COMMUNICATION, DETECTION, AND COHERENT RADIATION EQUIPMENT
J060	MAINT/REPAIR/REBUILD OF EQUIPMENT- FIBER OPTICS MATERIALS, COMPONENTS, ASSEMBLIES, AND ACCESSORIES



J070	MAINT/REPAIR/REBUILD OF EQUIPMENT- ADP EQUIPMENT/SOFTWARE/SUPPLIES/SUPPORT EQUIPMENT
J099	MAINT/REPAIR/REBUILD OF EQUIPMENT- MISCELLANEOUS
K060	MODIFICATION OF EQUIPMENT- FIBER OPTICS MATERIALS, COMPONENTS, ASSEMBLIES, AND ACCESSORIES
K070	MODIFICATION OF EQUIPMENT- ADP EQUIPMENT/SOFTWARE/SUPPLIES/SUPPORT EQUIPMENT
L070	TECHNICAL REPRESENTATIVE- ADP EQUIPMENT/SOFTWARE/SUPPLIES/SUPPORT EQUIPMENT
N058	INSTALLATION OF EQUIPMENT- COMMUNICATION, DETECTION, AND COHERENT RADIATION EQUIPMENT
N060	INSTALLATION OF EQUIPMENT- FIBER OPTICS MATERIALS, COMPONENTS, ASSEMBLIES, AND ACCESSORIES
N070	INSTALLATION OF EQUIPMENT- ADP EQUIPMENT/SOFTWARE/SUPPLIES/SUPPORT EQUIPMENT
R413	SUPPORT- PROFESSIONAL: SPECIFICATIONS DEVELOPMENT
R415	SUPPORT- PROFESSIONAL: TECHNOLOGY SHARING/UTILIZATION
W058	LEASE OR RENTAL OF EQUIPMENT- COMMUNICATION, DETECTION, AND COHERENT RADIATION EQUIPMENT
W070	W070 (LEASE OR RENTAL OF EQUIPMENT - INFORMATION TECHNOLOGY EQUIPMENT/SOFTWARE/SUPPLIES/SUPPORT EQUIPMENT)
5805	TELEPHONE AND TELEGRAPH EQUIPMENT
5810	COMMUNICATIONS SECURITY EQUIPMENT AND COMPONENTS
5811	OTHER CRYPTOLOGIC EQUIPMENT AND COMPONENTS
5820	RADIO AND TELEVISION COMMUNICATION EQUIPMENT, EXCEPT AIRBORNE
5821	RADIO AND TELEVISION COMMUNICATION EQUIPMENT, AIRBORNE
5850	VISIBLE AND INVISIBLE LIGHT COMMUNICATION EQUIPMENT
5895	MISCELLANEOUS COMMUNICATION EQUIPMENT
6010	FIBER OPTIC CONDUCTORS
6015	FIBER OPTIC CABLES
6020	FIBER OPTIC CABLE ASSEMBLIES AND HARNESSSES
6021	FIBER OPTIC SWITCHES
6030	FIBER OPTIC DEVICES
6032	FIBER OPTIC LIGHT SOURCES AND PHOTO DETECTORS
6035	FIBER OPTIC LIGHT TRANSFER AND IMAGE TRANSFER DEVICES
6060	FIBER OPTIC INTERCONNECTORS
6070	FIBER OPTIC ACCESSORIES AND SUPPLIES
6080	FIBER OPTIC KITS AND SETS
6099	MISCELLANEOUS FIBER OPTIC COMPONENTS
7010	INFORMATION TECHNOLOGY EQUIPMENT SYSTEM CONFIGURATION
7020	INFORMATION TECHNOLOGY CENTRAL PROCESSING UNIT (CPU, COMPUTER), ANALOG)



7021	INFORMATION TECHNOLOGY CENTRAL PROCESSING UNIT (CPU, COMPUTER), DIGITAL)
7022	INFORMATION TECHNOLOGY CENTRAL PROCESSING UNIT (CPU, COMPUTER), HYBRID)
7025	INFORMATION TECHNOLOGY INPUT/OUTPUT AND STORAGE DEVICES
7030	INFORMATION TECHNOLOGY SOFTWARE
7035	INFORMATION TECHNOLOGY SUPPORT EQUIPMENT
7040	PUNCHED CARD EQUIPMENT
7042	MINI AND MICRO COMPUTER CONTROL DEVICES
7045	INFORMATION TECHNOLOGY SUPPLIES
7050	INFORMATION TECHNOLOGY COMPONENTS
7435	OFFICE INFORMATION SYSTEM EQUIPMENT

Source: [PSC_Category_Alignment_June 2019_6-20-2019.xlsx](#)

Appendix C: FITARA Review Worksheet

FITARA Review Worksheet

This worksheet is a guide to prepare to:

1. Ensure the requirements owner has developed a good acquisition strategy and prepare them for briefing their FITARA approver
2. Provide a guide for FITARA reviewers and approvers

_ Review of the PWS and IGCE

_ Review the acquisition overview

- Did the business owner request and approve this requirement? Please provide documentation.

_ What are the FY Planned Actions

_ What is the Award History

_ What is the FY Spend Plan by Clin

_ What is the Current FY Spend Plan- Planned V. Actual YTD

_ What is the Scope of Contract/Programs Supported (includes Non-OIT Customers

_ Is this effort reimbursable from the VA Administrations and Staff Offices?

_ What is the Foot Print at VA

- How many users
- How many devices
- How many locations
- Does it connect to a VA initiative such as EHRM, VALOR, MISSION Act?

_ What are the Risks:

- What happens if this contract is not awarded
- Who does it effect
- What services are degraded

_ What is the Vendor Ecosystem

- Graphical depiction of the prime contractor and its subcontractors
- Services, Hardware, or Software provided by the subcontractor
- What commercial software or hardware components make up the vendor's proposed solution? Is any of the software/hardware on an existing VA contract?
- What services are provided on this contract? Services include, but is not limited to: labor, maintenance, licenses, warranty or training. Are any of the services on an existing VA contract?
- Does the PWS include a requirement that the vendor will provide a list of all OEM software and hardware included in their solution? This product list must include manufacturer name, product name, product description, quantity, version and model number.

_ What are the Best Practices/Lessons Learned

- Cost avoidance
- Efficiency Improvement

- Good News Articles
- Industry Recognition

_What are the Best Practices Applied for Contract Management

- Do you have a Weekly Project Status Report?
- Do you have Weekly meetings between portfolio level PM & COR and Prime contractor?
- Monthly Invoice reviews
- How do you resolve invoice conflicts?

_Did your acquisition plan/strategy change from the initial FITARA review to the FITARA approval review? If yes, what changed and why?

Appendix D: ARM Approval Document (Sample)

Approved Acquisition Review Request Document for ARM Serial Number 12953

2018-OIT-ITRM-012953-N/A-N/A has been approved in the Acquisition Review Module in the Budget Tracking Tool.

Acquisition Identifier #:	2018-OIT-ITRM-012953-N/A-N/A	Creator:	Armando OIT
Requisition Package POC Email:	bruce.wayne@va.gov	Creation Date:	04/18/18
Contract Title:	Release 7.2.7 Test Record For UAT Meeting		
Funding Source:	OIT-0167	Contracting Office:	TAC
Description of Acquisition:	Description of Acquisition		
Linked SPI Strips #:	2018-ITRM-25-2		
Current FY Estimated Action Amount:	\$200,000.00	Total Contract Lifecycle Estimated Amount:	\$1,000,000.00
Acquisition Action:	New Contract	Procurement Classification:	Information Technology
Type of Acquisition:	Hardware	Product Service Code:	3610 - Printing, Duplicating, and Bookbinding Equipment
In VIP:	No	Contract Life Cycle:	Base
Requested Award Date:	04/18/18	PM Email:	james.gordon@va.gov
Current Contract Action Period Of Performance:	From: 04/18/18 To: 04/19/18		

Approval History

ARM Requestor:	Armando OIT		
Management Quality & Control Review:	Steven Dodge	Approval Date:	04/20/18 07:00 AM
Infrastructure Operations Review:	Steven Dodge	Approval Date:	04/20/18 07:00 AM
Security Oversight & Compliance Review:	Steven Dodge	Approval Date:	04/20/18 07:00 AM
Solution Delivery Review:	Steven Dodge	Approval Date:	04/20/18 07:00 AM
FITARA Review:	Director FITARA	Approval Date:	04/20/18 10:55 AM

Generated in the Budget Tracking Tool by Armando OIT on 04/20/2018 at 01:15 PM.



Appendix E: FITARA APPROVAL BRIEFING TEMPLATE



CIO FFITARA Review
PowerPoint 712020.i