Testimony of

A.R. "Trey" Hodgkins, III
Senior Vice President
IT Alliance for Public Sector

before a joint hearing of the

Subcommittee on Information Technology
and the
Subcommittee on Government Operations

of the

U.S. House of Representatives
Committee on Oversight and Government Reform

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IT Alliance for Public Sector Testimony on Reviewing Challenges in Federal IT Acquisition
House Committee on Oversight and Government Reform
March 28, 2017
Page 2

Introduction

Chairmen Hurd and Meadows, and ranking members Kelly and Connolly, thank you for the opportunity to share our perspectives on challenges the federal government faces in regards to information technology (IT) investment, acquisition, and management.

There are many stakeholders, including leadership in Congress, who should be applauded for their expenditure of a great deal of time and effort to reform acquisition over the last few years. The technology sector, however, has not found those efforts at reform, as well-meaning as they are, to have had substantial effect, and in many cases, they have only resulted in incremental changes addressing symptoms, rather than the root problems, of the dysfunction in government acquisition.

Although many policies and principles still are relevant, we believe that the processes used to identify, acquire, and deploy IT that were developed in the latter part of the last century, and the regulatory environment that has evolved around them, are no longer conducive to effective outcomes, they fail to deliver best value for the taxpayer, and they are not providing optimal solutions for mission success.

The IT Alliance for Public Sector (ITAPS) proposed to President Trump and others in his administration that the time was ripe to change the way the federal government acquired IT, and we would make the same suggestion to the committee. We recommended that the path to achieving the new administrations' stated goal of increased cybersecurity protections for government networks was through IT modernization. Further, we linked acquisition reform as being essential to the ability to modernize IT in the government and the attainment of greater cyber assurance. In other words, we cannot have cybersecurity without IT modernization, and we cannot acquire the goods and services we need for either of these goals without changing the way we acquire IT. All three are inextricably linked. We believe that the committee and Congress should approach these objectives and challenges in a similar fashion.

Many of the challenges with IT acquisition lie in processes that anticipated lengthy development to deliver a platform or solution for use over a long period of time. We are still using weapons platforms that were designed and deployed in the middle of the last century, and, as this committee has identified, we are using IT systems that are now decades old. That dynamic has never really applied for information technology. In fact, Moore's Law drives a new dynamic where capabilities and computing power evolve rapidly and the need to upgrade, as well as improve, happens in shorter and shorter increments. To deliver these new capabilities, modernize IT, and better secure the governments' networks, the time is right to re-imagine our acquisition process.

We would recommend that Congress and the Trump Administration focus on the following starting points for legislative and executive branch actions:

1) <u>Assess and Inventory the Technologies We Have Today.</u> While some inventorying has been done, we do not have a complete picture of what IT hardware and software the government owns or is using. Such an action serves several purposes: 1) uncovering exactly what the federal government owns and what it is doing with it; 2) determining where vulnerabilities may exist to prioritize investments in cyber protections; and 3) deciding what needs modernization and how best to achieve it. Congress should use oversight to enforce existing inventory requirements and establish new requirements where there may be gaps.

IT Alliance for Public Sector Testimony on Reviewing Challenges in Federal IT Acquisition
House Committee on Oversight and Government Reform
March 28, 2017
Page 3

2) <u>Identify Meaningful Funding for Modernization.</u> Last Congress, ITAPS strongly supported the efforts by Chairman Hurd, ranking member Connolly, and others to fashion a bipartisan, bicameral means of funding IT investment, and we encourage their continued focus on this issue. The funding challenge Congress must resolve is that agencies either have the appropriations to continue operating the IT investments they have already made or fund investment in modernization, but they do not have enough funds for both. Without such a change, the federal government will be unable to modernize IT or effectively assure the networks and systems from cyber threats.

3) <u>Invest in a Tech-Savvy Workforce.</u> While there are many smart and tech-savvy IT personnel within the federal government, there are simply not enough of them to fully address the issue of modernization, let alone acquire all those new information technology capabilities. Congress should focus on establishing better IT training and digital capabilities for existing personnel to make them more tech-savvy, regardless of their role. Congress should also work to unencumber the federal hiring process to attract new talent that can bring new ideas into the federal workforce.

4) <u>Unleash the Innovative Power of the Existing Industrial Base and the Commercial Sector.</u> There is significant innovation in the companies already selling goods and services to support the government mission, but the compliance and government unique requirements placed on vendors distorts what they can sell and how they can deliver it. For commercial companies that might supply their products, subcontract their services, or sell directly to the government customer, such compliance requirements are often prohibitive. Congress should address these compliance burdens and requirements to remove those that do not improve the acquisition outcome or drive better value for the taxpayer. In other words, Congress should help make the government a better customer.

Not all of these challenges can be addressed through legislative actions, but many solutions and outcomes can be driven through the oversight role this committee and Congress can exercise. This committee's attention to the implementation of the Federal Information Technology Acquisition Reform Act (FITARA) is a good example of pursuing intent through oversight. Additionally, much of what we mutually seek requires cultural changes, some of which will not be simple, and Congressional oversight of agency management can help to drive those changes.

We did not get where we are overnight, and solutions and modernization will not happen overnight either. We can no longer accept, however, that these challenges are "too hard" to address. ITAPS would encourage the committee and Congress to embrace and enable IT modernization—and all that it can deliver—and reimagine IT acquisition with us. We are ready to help with such an undertaking.

Thank you again to the Chairmen, ranking members, and members of the committee, for the opportunity to present these thoughts to you today. I would be happy to address your questions at the appropriate time.

IT Alliance for Public Sector Testimony on Reviewing Challenges in Federal IT Acquisition
House Committee on Oversight and Government Reform
March 28, 2017
Page 4

Extended Written Remarks for the Committee on "Reviewing Challenges in Federal IT Acquisition"

Congress, and particularly the House Committee on Oversight and Government Reform, should not look to resolve challenges in federal IT acquisition with one legislative proposal. Instead, ITAPS would recommend approaching the discovery of options and solutions in short- and long-term efforts. The comments and topics below are arranged with that approach in mind.

Short Term – 115th Congress

Inventory and Assess the IT Assets of the Federal Government.

While some inventorying has been done, we do not have a complete picture of what IT hardware and software the government owns or is using. Such an action serves several purposes: 1) exposing exactly what the federal government owns and what is it doing with it; 2) determining where vulnerabilities may exist to prioritize investments in cyber protections; and 3) deciding what needs modernization and how best to achieve it. Congress should use oversight to enforce existing inventory requirements and legislatively establish new requirements where there may be gaps.

As noted below, ITAPS would not support additional information collection requirements on contractors to achieve this inventory, but would expect the Office of Management and Budget (OMB) to coordinate with the agencies to determine what IT assets they have deployed.

Identify Meaningful Funding for Modernization.

ITAPS strongly supported the efforts by Chairman Hurd, ranking member Connolly, and others to fashion a bipartisan, bicameral means of funding IT investment last Congress, and we encourage their continued focus on this issue. The funding challenge the Congress must resolve is that agencies have the appropriations to either continue operating the IT investments they have already made, or fund investment in modernization, but they do not have enough funds for both.

The annual investment across the federal government in sustaining the IT capabilities we have today now exceeds seventy-five percent of all the dollars the federal government spends on IT—approximately sixty billion dollars in Fiscal Year (FY) 2016. Compounding that problem is the dysfunctional appropriations process that has resulted in over one hundred seven continuing resolutions in the last twenty years. Since agencies cannot expend dollars for new investments, including for IT modernization, they have been forced to resort to sustaining what they have. Such a level of sustainment is untenable and we must find a way to alleviate this dynamic. Congress should also investigate the current funding cycles and understand how those negatively impact the ability for agencies and departments to do more than just sustain the IT capabilities they have now. For example, when agencies must identify the technology they wish to acquire, input that into a funding request, and subsequently into the appropriations process, it could be years before Congress even considers whether to fund the request. That means the agency is already starting from a disadvantage because they will be looking at acquiring years-old technology, if funding is ever appropriated. A new

IT Alliance for Public Sector Testimony on Reviewing Challenges in Federal IT Acquisition
House Committee on Oversight and Government Reform
March 28, 2017
Page 5

means of funding agency needs, using technology available when the need is identified and not years-old technology, must be identified and established if Congress should ever hope to move away from the condition where agency dollars are being spent to primarily sustain IT operations, rather than update and upgrade them.

Invest in a Tech-savvy Workforce and Better Enable Them to Succeed.

While there are many smart and tech-savvy IT personnel within the federal government there are simply not enough of them to fully address the issue of modernization, let alone acquire all those new information technology capabilities. Congress should focus on establishing better IT training and digital capabilities for existing personnel to make them more tech-savvy, regardless of their role. Congress should also work to unencumber the federal hiring process to attract new talent that can bring new ideas into the federal workforce.

Improve Hiring Practices. The 115th Congress has already begun to legislatively address some of the disconnect between the antiquated hiring processes used by the federal government and hiring practices aimed at the diverse, multi-generational workforce in America today, but more can be done. Currently, there is a significant shortage of educated computer engineers in our workforce, and each year the federal government competes with the private sector in a competition where there are insufficient numbers of new graduates to fill the employment need. Moreover, the private sector can oftentimes offer more in the way of compensation than the federal government.

Delay in the process remains one of the single biggest challenges to finding and hiring new personnel. This condition is particularly acute when hiring cyber or computer engineers, IT architects, or programmers and developers. The demand for these skills is so high that people will simply not wait for the federal hiring process when so many other opportunities exist in the workforce for these skill sets. Without changes to alleviate the length of time it takes to get an approval, the federal government will struggle to identify and hire skilled, tech-savvy personnel.

Another drag on the efficient and timely operation of the process is the growing backlog of applications at the Office of Personnel Management (OPM) to approve personnel as eligible and suitable for hiring. This is compounded when these personnel need a security clearance, where there are now over 500,000 applications pending investigation and no foreseeable solution to reduce that backlog. Delays of this sort impact both agencies and contractors when attracting personnel, completing the hiring process, retaining them once hired, and they cost the taxpayer untold millions of dollars annually.

As further evidence of these systemic challenges, initiatives like the Presidential Innovation Fellows, 18F, and the U.S. Digital Services have all resorted to using Presidential Appointment Schedule A hiring authorities to get around these conditions and bring recruits on quickly. This committee and Congress should use their oversight authority to examine the hiring process along with the backlogs at OPM, and work to reduce the delay so the federal government can compete in the hiring market and effectively sustain an adequate workforce.

Enhance IT Career Paths. Only recently has the federal government created an IT management career path and more could be done to enhance and strengthen this career choice inside the federal government. For example, to encourage qualified personnel to focus on information technology,

IT Alliance for Public Sector Testimony on Reviewing Challenges in Federal IT Acquisition
House Committee on Oversight and Government Reform
March 28, 2017
Page 6

Congress should consider incentivizing the IT career path inside the federal government. Educational assistance and accelerated earning power are two means that industry uses to incent personnel. The committee should also examine existing government-industry IT personnel exchanges and look to authorize such a program for the federal civilian agencies. ITAPS members believe that such exchanges as well as the experience, knowledge, and understanding gained would be very beneficial to the government.

Establish Meaningful IT Training. While many agencies have some form of cyber hygiene training for personnel, there is little beyond that in the way of IT training and almost no training to educate acquisition personnel about effective market research in the commercial IT market. Such training is essential, and the committee should consider establishing requirements for such training and incentivize personnel as noted above to obtain and maintain this training. Establishing and maintaining such skills are critical to ensuring that efforts to reform IT acquisition take hold in the various agencies and can be used to modernize technology capabilities. Additionally, the committee should use its oversight responsibilities to examine previously authorized efforts to create IT cadres within the federal government that can serve to advise agencies that may not yet have developed organic IT market research for their needs or struggle to do so.

Additionally, the committee should examine some of the experiences of the Digital Acquisition Accelerator for any lessons learned from the pilot on how to expand contracting officials' understanding of IT software and systems and improve IT acquisitions. In addition, it should examine the curricula at the Federal Acquisition Institute, the Department of Homeland Security Acquisition training, and other acquisition training institutions to determine what, if any, course work focuses on IT acquisition. It should look to set minimum IT graduation requirements for all personnel entering these institutions and require even more advanced training for those in the IT career path, as noted above. Additionally, the committee should work with the House committee on Armed Services to ensure that similar IT training at the Defense Acquisition University is also examined and evolved, as necessary, and is consistent with that offered in the federal civilian training programs.

Require the Formation of Acquisition Teams in and from the Agencies. ITAPS would strongly encourage the committee to evolve acquisition practices to require the formation and sustainment of teams of qualified personnel from each phase of an acquisition when starting a substantial IT acquisition and make this the normal practice. Such a team would be formed at the beginning of the process when the need is identified by the operators and continue through the development of requirements, contracting, acquisition, and into the program management. A team should function as such, and not remain isolated inside "stovepipes" of activity inside the team. The result would help to address situations in which the operational mission does not receive what it needs because the acquisition is conducted in a disconnected, stove-piped process that prevents effective coordination and communication across functional areas. Such a reform would likely require legislative change to drive the intended result across the various functional areas.

Establish Meaningful Communication with Industry. ITAPS strongly believes that far more can be done to enhance and improve engagement with industry, and that such engagement is crucial to effective acquisition, particularly for the acquisition of IT, because the capabilities and offerings evolve and change so rapidly. For example, the Federal Acquisition Regulations (FAR) Council recently published for public comment a revision to the FAR intended to help create "effective communications" and

IT Alliance for Public Sector Testimony on Reviewing Challenges in Federal IT Acquisition
House Committee on Oversight and Government Reform
March 28, 2017
Page 7

clarify that acquisition personnel can and should engage in robust communication with industry to have strong relationships with various offerors and to gain a more thorough understanding of capabilities and offerings available. ITAPS filed comments supporting the effort and the intent, but identified several additional steps that the proposed rule could take to help address persistent impressions in the acquisition workforce that engagement and communication with industry is not permitted or only encouraged in specific, very narrow, limited circumstances. We would commend the recommendations made in the filing to the committee as actions that can be addressed both through oversight and clarifying legislation.

<u>Evolve the Acquisition and Oversight Culture.</u> One of the most substantial challenges facing any effort at effective IT acquisition reform, and acquisition reform in general, is the need to bring about changes to the cultural norms inside the federal acquisition workforce. Industry has noted on countless occasions that the risk-averse nature of the acquisition workforce is not conducive to effective IT acquisition and, in fact, such aversion contributes to the current state of federal information technology. For IT, the commercial sector has evolved away from traditional, waterfall development methodologies to streamlined, rapid development methodologies that deliver incremental capabilities using small, modular development. Such methodologies have frequently been characterized as "fail fast and fail often." These cultural norms for IT development in the commercial sector have led to the invention of most of the commercial and consumer information technologies in place today and are being used to rapidly prototype the capabilities of tomorrow. But, the idea of failing at all is not currently acceptable inside the federal government. To address challenges that range from the use of cyber capabilities by ISIS and al Qaeda to nation-state hacking; to development and implementation of constituent centric capabilities and services; and IT modernization; the federal government must adopt, embrace, and implement such thinking, and the culture to incubate such behavior.

Unfortunately, the current acquisition environment, in particular, the oversight regime, is not conducive to this change in culture that the government must incubate to be able to develop the organic IT acquisition skills needed in the digital era. The committee should focus on making risk management, rather than risk avoidance, the norm. Expectations, and oversight criteria, must be reimagined to permit the IT and acquisition workforces in the federal government to take risk in a managed fashion, rather than futilely attempting to create a risk-free environment. It simply cannot be done, and efforts in the legislative and executive branch to require them present substantial challenges to effective reform of IT acquisition.

<u>**Unleash the Innovative Power of the Existing Industrial Base and the Commercial Sector.**</u>
There is a lot of innovation in the companies already selling goods and services to support the government mission, but the compliance and government unique requirements placed on vendors distorts what they can sell and how they can deliver it. It also pre-determines what they can offer. For commercial companies that might supply their products, subcontract their services, or sell directly, such compliance requirements are often prohibitive. Congress and the committee should address these compliance burdens and requirements with the objective of removing those that do not improve the acquisition outcome or drive better value for the taxpayer. In other words, Congress should help make the government a better customer to enable and sustain access to the goods and services it requires.

IT Alliance for Public Sector Testimony on Reviewing Challenges in Federal IT Acquisition
House Committee on Oversight and Government Reform
March 28, 2017
Page 8

Sunset Regulations and Reform the Way They are Promulgated. The Congress has already begun to take steps to reform how regulations are promulgated, and ITAPS applauds those actions. The committee should go further for all acquisition regulations in the federal government and sunset them, with the requirement that each be reviewed and justified by Congress and/or the promulgating agency before any provision can be sustained. Criteria for such review and justification should include relevance, efficacy, cost or burden and whether the provision improves the outcome of acquisitions and drives better value for the taxpayer.

Make Acquisition Regulation Information Collections Meaningful. ITAPS has conducted extensive research of the existing regulatory information collections imposed on contractors to the federal government. This research revealed the following findings, conclusions, and recommendations:

- Per the U.S. government, there are over 9,500 separate information collection (IC) requirements associated with statutory and regulatory compliance that have an annual burden of over $1.877 trillion[1].

- Of these, in May of 2015, ITAPS identified 164 IC actions associated with the FAR or the Defense Federal Acquisition Regulations Supplement (DFARS). All of them require a three-year waiver issued by OMB for release from requirements of the Paperwork Reduction Act (PRA).

- While a relatively small number, these 164 FAR and DFARS ICs represent an annual burden for taxpayers of over $4 billion and impose over 70 million man-hours of compliance for the government and the vendor community[2]. For the vendor community, these ICs translate into reporting requirements and compliance exercises. The array of topics for which vendors are compelled by law or regulation to provide information to the government are extremely diverse and include past performance records, personal conflicts of interest, responsibility matters, and assurance that their products were not produced by forced or indentured child labor, among others.

- ITAPS compiled various government-provided data about each of these IC actions to determine what, if anything, could be done to portray more accurately the burden these ICs impose and improve the estimating methodology, make recommendations about how to reduce those burdens, and better direct the devotion of resources to achieve improved acquisition outcomes.

MAJOR FINDINGS & CONCLUSIONS

- Industry strongly believes that the government woefully underestimates the burden and costs associated with these ICs. The PRA specifies:

    "Burden is the time, represented as hours spent by the public responding to Federal information collections. When an agency estimates, and seeks to reduce the paperwork burden

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[1]Office of Information and Regulatory Affairs (OIRA); Inventory of Currently Approved Information Collections; March 13, 2017; - http://www.reginfo.gov/public/do/PRAReport?operation=11

[2]As of May 5, 2015. For cumulative data select Department of Defense or DoD/GSA/NASA(FAR) from Agency dropdown menu; of Information and Regulatory Affairs (OIRA) - http://www.reginfo.gov/public/do/PRAMain

IT Alliance for Public Sector Testimony on Reviewing Challenges in Federal IT Acquisition
House Committee on Oversight and Government Reform
March 28, 2017
Page 9

it imposes on the public, the agency must consider the time that an individual or entity spends reading and understanding a request for information, as well as the time spent developing, compiling, recording, reviewing, and providing the information." [3]

Most burden estimates appear to reflect a lack of knowledge about the steps companies take, the information systems they build and the compliance regimes they establish or undertake to develop, compile, record, review, and provide the relevant data for each IC.

- Some estimates egregiously underestimate the burden for both the government and industry. For example, one agency estimated that the burden of compliance for an IC was 0.6667 minutes per response – which they reported was the time it took respondents to click "submit" on an online portal[4]. Such an estimate clearly overlooks several elements of the burden estimate the PRA identifies should be part of the calculation.

- Too frequently, the effort to estimate burden and associated waivers from the PRA become little more than a rubber stamp exercise, particularly when there is no public response to the Federal Register publication of intent to create or renew a waiver. Statements from government employees who process these waiver requests indicate that without a challenge to a waiver, additional assessment of the burden is rarely undertaken. This condition has left some waivers in place for decades without any re-evaluation of the burden.

- There are currently no mechanisms in place for the government to capture the actual data regarding submissions for ICs. Instead of counting the number of submissions, the number of respondents and requesting actual burden information, each burden assessment ignores any information and relies entirely on estimates, usually recycling those used during the last waiver request.

- ITAPS has found an inordinate number of instances of incomplete or inaccurate published data in the Federal Register notices, the supporting documentation found on reginfo.gov, and on the Office of Information and Regulatory Affairs (OIRA) website.[5]

RECOMMENDATIONS:

The committee should employ its oversight authority to direct OMB to undertake reform of Information Collections, including:

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[3]OIRA homepage; Office of Management and Budget (OMB); March 13, 2017; - https://www.whitehouse.gov/omb/oira

[4] OMB Control Number 9000-0161 "Reporting Purchases from Sources Outside the United States,"; Office of Information and Regulatory Affairs (OIRA); - http://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=201305-9000-002

[5] As of May 5, 2015. For cumulative data select DoD/GSA/NASA(FAR) from agency dropdown menu; Office of Information and Regulatory Affairs (OIRA); - http://www.reginfo.gov/public/do/PRAMain

IT Alliance for Public Sector Testimony on Reviewing Challenges in Federal IT Acquisition
House Committee on Oversight and Government Reform
March 28, 2017
Page 10

- Immediately address the errors and omissions in data on government websites regarding the singular and cumulative burden costs estimates, including cost estimates reported as $0 on the Notice of Action documents.

- Evaluate the IC review process to determine what steps can be taken to ensure the process does not slip into a "rubber stamp" exercise in the future.

- Mandate as part of any IC review that the requesting agency determine whether the government already collects or possesses the same or similar data, or if the data is available from a public source. If the same or similar data is identified, the agency should be prohibited from requesting a waiver from the PRA and instead should be directed by OMB to identify what steps and resources are necessary to expose the data for purposes of satisfying the IC requirement, instead of devoting additional resources to the development of a new information collection mechanism. Because this authority at the agencies rests with the Chief Information Officer, this effort comports with Congressional intent under the Federal Information Technology Acquisition Reform Act (FITARA).

- Require as part of any IC review process that the requesting agency determine if the data collected by this IC is still relevant and used by the acquisition and/or oversight communities to inform acquisition decisions and provide information to relevant congressional committees if any regulations are determined to not meet these criteria.

- Prescribe a template for publishing the IC waiver requests in the Federal Register, including, but not limited to, inclusion of the cost and hour burdens and requirements, as well as hyperlinks to all supporting documents and data. OMB should also prescribe a template for the supporting statements, so that they can be clearly understood by the public and the rationale is logical[6]. The prescribed template should include a requirement for the agency to include the date of the statement and for the provision of an explanation of the estimating methodology (i.e., how many people, what GS grade, pay scales, etc.) when developing burden estimates.

- Review the Paperwork Reduction Act and identify elements that should be updated to align processes and the availability of data in the digital era.

- Identify means to capture and compile data as it is being produced, particularly in government transactions for goods and services, to alleviate the costly burdens the current redundant process can create. Industry would suggest that GSA could be tasked with developing such a capability as part of their initiative for a prices-paid portal, instead of fully implementing the Transactional Data Rule, which created a redundant requirement for industry to report data already in the possession of the agency.

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[6] OMB Control Number 9000-0138 "Contract Financing - FAR Sections Affected: Subparts 32.0 thru 32.1; 32.2; 32.5; 32.10; 52,232,"; Office of Information and Regulatory Affairs (OIRA); - http://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=201403-9000-010[6]

IT Alliance for Public Sector Testimony on Reviewing Challenges in Federal IT Acquisition
House Committee on Oversight and Government Reform
March 28, 2017
Page 11

- Create disincentives for emergency extensions of waivers. Because the waivers have a three-year approval, agencies should have more than adequate opportunity to conduct reviews and submit requests in a timely fashion.

Reduce the Application of Regulatory Requirements on Commercial Items and Rescind Flow Down Requirements Where Possible. The committee should examine the number of government-unique FAR clauses applicable in a FAR Part 12 transaction and work to reduce the number substantially. When the FAR was first published, there were but a handful of requirements that applied to commercial item transactions and in keeping with the congressional intent to make Part 12 transactions as close as possible to a commercial transaction for the same or similar good or service. Today that number exceeds six dozen separate government-unique requirements placed on the acquisition of commercial goods and services, distorting the federal market as a compliance labyrinth and imposing a barrier for market access or sustainment.

Furthermore, the committee should examine the number of provisions in the FAR and the acquisition regulation supplements that flow down to lower tiers in the supply chain, including for the acquisition of commercial goods, services, and supplies. Many providers in the commercial marketplace do not even know the federal government is the end user of their products or their products are a component or sub-component to a larger platform or capability. But these companies are now subject to dozens of requirements that they do not encounter in the commercial market. These requirements further alienate potential vendors and place inordinate compliance burdens on companies whose business model does not support them.

Examine Factors Leading to the Creation of Alternative Acquisition Models. A few programs and initiatives, including 18F and the Defense Innovation Unit Experimental (DIUx), have been undertaken because of frustrations that the government is unable to use existing processes effectively to acquire and deploy the information technology capabilities currently available for the government mission. A better way is needed. ITAPS member companies share that frustration and strongly support updating and reforming existing acquisition protocols, while avoiding the creation of bifurcated pathways to competition that pick winners and losers or do not improve the opportunity to deliver innovative goods and services for all. Regardless of the methods used, none of them address the root causes in the existing acquisition processes and protocols and instead seek to establish an alternative acquisition model.

ITAPS members would offer the following recommendations on 18F and OTA activities, like DIUx:

- As we stated in our testimony[7] before this committee, ITAPS supports the original objectives of 18F as a technology advisor to program managers and procurement personnel, and we believe that 18F's incorporation into the Technology Transformation Service at the General Services Administration (GSA) will help to mature and standardize this kind of support to avoid mission creep that can delay and distract programs.

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[7] U.S. Cong. House. Committee on Oversight and Government Reform, Subcommittee on Info. Tech. and Subcommittee on Gov't Operations. *Hearing on 18F and U.S. Digital Service Oversight, June 10, 2016.* 114th Cong. 2nd sess. Washington: GPO, 2016 (statement of A.R. "Trey" Hodgkins, III, Senior Vice President, IT Alliance of Public Sector).

IT Alliance for Public Sector Testimony on Reviewing Challenges in Federal IT Acquisition
House Committee on Oversight and Government Reform
March 28, 2017
Page 12

- 18F should focus its technology expertise on helping program managers and procurement personnel understand technology options available to allow agency personnel to conduct better program management and better procurements. By so doing, it can assist agencies in transforming their cultures to address complex IT procurements.

- The government could consider identifying opportunities where 18F staff could inform and develop new technology training at federal training institutions, like the Federal Acquisition Institute or the Defense Acquisition University, or in digital forms, like micro-credentialing certifications, for the career advancement and education of personnel responsible for acquisition and procurement requirements.

- Help provide a better general understanding of information technology across the federal workforce and, specifically, the commercial IT market and the goods and services it offers.

- Assist agencies in the enterprise management of their existing IT infrastructure, and provide counseling to agencies in the best manner to modernize, streamline, and maintain the operation of these systems.

- As an organization of technology experts, 18F should not engage in the business of conducting procurements, either as a procurement office, a systems integrator, or program manager for an agency. Instead, its association with procurement should be directed toward conveying its technology expertise to agencies. It should understand the procurement processes to be able to assist agency personnel with questions on technology issues so that program managers and acquisition personnel may conduct procurements that comply with procurement law and regulation.

- Considering the foregoing, 18F should not duplicate the work of the private sector, nor compete against it. It also should not engage in entrepreneurial enterprises, like selling services to state governments. Such activity distorts the necessary focus of 18F, displaces private sector competition, and raises fundamental and statutory questions about the role of government.

- When government must create a means, like OTAs, around a burdensome or prohibitive process or protocol to acquire an IT good or service, then that process or protocol should be mitigated or rescinded. An inequity is created when the OTA is employed to enable market access for a select few, leaving others in the market to continue to contend with the burden or prohibition. Instead of creating an alternative pathway for market access, the committee and Congress should act to remove the burdensome, prohibitive process or protocol to improve market conditions for all, enabling increased competition and driving better outcomes for taxpayers. Such an exercise of identifying the root causes of the needs for alternative acquisition models and OTAs presents a roadmap for actions that can drive IT acquisition reform.

<u>Tap the Expertise of the Federal Vendor Base for IT Modernization.</u> The existing vendor base has delivered IT rich programs for the federal government for decades and should be treated as a source of information and knowledge to address the challenges of IT modernization. Many have examined the questions inherent in any IT modernization undertaking and the following links offer some insight into issues, best practices, and solutions for consideration.

IT Alliance for Public Sector Testimony on Reviewing Challenges in Federal IT Acquisition
House Committee on Oversight and Government Reform
March 28, 2017
Page 13

- [Legacy Modernization 101 - CIO](#)
- [What to Look for While Modernizing Legacy Systems - CIOReview](#)
- [Two Ways to Modernize IT Systems for the Digital Era – McKinsey & Company](#)
- [An Agile Financing Model: Agile Share-in-Savings - FedScoop](#)
- [Cross-agency Collaboration in New Zealand Offers Insights for US Feds - FederalTimes](#)
- [Modernizing Legacy Systems in Insurance – The Case for Transforming Core IT Systems in the Insurance Industry - Protiviti](#)
- [Modernization in the Digital Era: IT at an Inflection Point - Accenture](#)

Long-term Issues – 115th and Beyond

ITAPS Members Fully Support the Section 809 Panel. ITAPS members are very supportive of the work of the Section 809 Panel and would commend their work to the committee for close coordination. The panel is expected to produce interim recommendations in 2017 and is slated to complete work and provide final recommendations in 2018. It is our expectation that many, if not most, of their recommendations will lend themselves to government-wide application, and the committee should position resources to accept, analyze and act upon the recommendations as they are made public.