NITAAC
REIMAGINING ACQUISITIONS

WHITEPAPER

OMB's New Guidance on Information Technology Management

The Office of Management and Budget (OMB) released a long-awaited revision to **Circular A-130** that serves as the government's guiding policy for managing and maintaining information technology resources this past July.

One of the most important documents in federal acquisition, Circular A-130 establishes official OMB policy and guidance on information technology management for federal executive agencies, based on current laws, executive orders and prior guidance documents.

Agencies use this guidance to ensure the information technology products that are purchased fall within certain guidelines. As technology continues to develop, Circular A-130 must be updated to stay modern with the current technological environment. It is imperative that the acquisition community stay abreast of the new updates to ensure future technology acquisitions fit within the parameters the document sets.

✉ NITAACsupport@nih.gov • ☎ 1.888.773.6542 • ⌂ NITAAC.NIH.gov

CIO·SP3 IT SERVICES/SOLUTIONS | CIO·SP3 SMALL BUSINESS IT SERVICES/SOLUTIONS | CIO·CS IT COMMODITIES/SOLUTIONS

What is Circular A-130?

Circular A-130 was first issued in 1985 to meet **information management resource requirements** included in the Paperwork Reduction Act of 1980. OMB revised the circular in 1994, 1996 and 2000, but until recently that document remained stagnant, although there has been discussion of revising the regulation as far back as 2005.

On July 28, OMB released the document's first revision in more than 15 years with an increased focus on security and the management of data assets. OMB explained the revision in a blog post co-authored by U.S. Chief Information Officer Tony Scott; then-U.S. Chief Acquisition Officer Anne Rung; Howard Shelanski, Administrator of the Office of Information and Regulatory Affairs; and Marc Groman, Senior Advisor for Privacy at the Office of Management and Budget.

"The way we manage information technology (IT), security, data governance, and privacy has rapidly evolved since A-130 was last updated in 2000," the four wrote. The post continued, *"As government continues to digitize, we must ensure we manage data to not only keep it secure, but also allow us to harness this information to provide the best possible service to our citizens."*

The focus areas in the sidebar drove many of the decisions in the revised version of Circular A-130. While these areas provide direction on the type of technologies and their need for government, the question for the acquisition community must be how to enable their purchasing.

What is New in A-130?

The revision of Circular A-130 makes a number of policy updates, but includes three main focus areas:

REAL TIME KNOWLEDGE OF THE ENVIRONMENT

With technology evolving at rapid speed, agencies must move away from the periodic, compliance-driven technology assessments that drove decision making in the past. In order to keep pace, agencies must continuously assess systems and build-in security and privacy with every update and re-design. Throughout the Circular, OMB makes a clear shift away from checklist exercises in favor of the ongoing monitoring, assessment and evaluation of information resources.

PROACTIVE RISK MANAGEMENT

Government must constantly innovate to keep pace with the needs of citizens, but to do so, agencies must modernize how they identify and manage risk. The revision to Circular A-130 emphasizes the need for strong data governance that encourages agencies to proactively identify risks, determine practical and implementable solutions to address said risks, and implement and continually test the solutions.

SHARED RESPONSIBILITY

Citizens connect with each other in ways never before imagined. The updated A-130 helps to ensure everyone remains responsible and accountable for assuring privacy and security of information – from managers to employees to citizens interacting with government services.

Impact on Acquisition

To improve the acquisition of these technologies, Circular A-130 offers agencies **guidance in managing IT investment**. While a number of the 10 recommendations (found on pages 10 and 11 of the revised document) reiterate technology acquisition best practices, there are a number of takeaways for agencies to consider.

For example, A-130 implores agencies to structure acquisitions for major IT investments into useful segments with a narrow scope and brief duration. This type of agile acquisition will reduce risk, promote flexibility and interoperability and increase accountability.

OMB also would like agencies to use more modular contracts that can be awarded within 180 days after the solicitation is issued, with the technology delivered within 18 months. If those criteria cannot be met, agencies should reconsider the project.

Finally, agencies should **promote innovation in IT procurements**, along with a strong emphasis on **security**, **privacy**, **accessibility**, **records management** and other relevant requirements in line with the needs of modern technology procurement.

Looking to Modern Procurement

One of the most successful modern procurement methods has been the **Government-Wide Acquisition Contract (GWAC)**, established to streamline acquisitions under the **Clinger-Cohen Act of 1996**. The National Institutes of Health Information Technology Acquisition and Assessment Center (NITAAC), was one of the first programs awarded the distinction of administering and awarding GWACs. With three vehicles to cover the IT spectrum — CIO-SP3, CIO-SP3 Small Business, and CIO-CS — **NITAAC gives agencies flexibility to pursue either direct or assisted acquisition**; mitigates existing acquisition skills gaps across the government; and promotes a customer-focused acquisition culture that tailors acquisitions to agency-specific needs.

NITAAC also runs the **Government-Wide Strategic Solutions (NITAAC-GSS) program** under CIO-CS, which helps agencies receive better prices on desktops and laptops by leveraging the government's significant buying power. Called category management, this type of acquisition helps reduce costs for everyone involved. It ties into A-130's direction to consider existing federal contracting solutions available within the same agency or from other agencies.

Leveraging Existing Vehicles

Another one of the OMB best practices for acquisition calls for agencies to leverage existing contract solutions whenever possible, in part to avoid duplicative investments, but also as a way to more easily procure technology.

Agencies in need of new technologies under Circular A-130 can turn to NITAAC to take advantage of existing government-wide procurement vehicles. NITAAC offers three GWACs for information technology procurement. **These contracts, CIO-SP3, CIO-SP3 Small Business and CIO-CS, can be used by any federal civilian or Department of Defense agency to acquire information technology products, services and solutions.** Agencies searching for everything from email to enterprise-wide systems, computers to continuous detection monitoring and mitigation solutions, will find NITAAC GWACs offer the products and services they need.

In these types of vehicles, contract holders are pre-vetted to save time and money. **Ordering is also done through the easy to use, secure and web-based electronic-Government Ordering System (e-GOS)**, which further streamlines ordering and processes. The system also collects and can provide the type of granular data necessary to comply with FITARA and other laws, policies and directives as Circular A-130 instructs.

Authorized as an Executive Agent by the OMB, NITAAC is the premier provider of IT GWAC programs. The office **can help agencies procure IT services, solutions and commodities that meet all federal laws and regulations**, such as those outlined in Circular A-130 and its supporting federal acquisition documents, such as the Federal Acquisition Regulation (FAR).

Questions or comments? Please contact NITAAC at **1.888.773.6542** or **NITAACsupport@nih.gov**