FITARA at a Crossroads

Ten Recommendations to Improve FITARA Implementation



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BY KAREEM EL-ALAILY, RICH BEUTEL, AND MIKE HETTINGER

Censeo Consulting Group is a strategy and operations consulting firm focused on helping mission-driven organizations strengthen their management and operational capabilities to achieve social and public impact. Censeo is called upon by leadership and management teams in the government, higher education, and nonprofit sectors to support critical initiatives during times of urgent need. By leveraging our analytical approach and engagement model, we are not only able to identify strategic priorities, but we also collaborate closely with our clients to rapidly execute on plans and make change a reality.



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About this Study

Censeo Consulting Group, Cyrrus Analytics and Hettinger Strategy Group undertook this study of the Congressional FITARA Scorecard ("Scorecard") to determine its impact on statutory implementation in terms of its continuing viability, current structure and future playbook. Formal, non-attributional interviews were conducted with eight major CIO departments at CFO Act agencies, officials from OMB and GAO as well as numerous current and former senior-level federal IT stakeholders.

This study began as an inquiry regarding the current state of the Scorecard metrics, which currently comprise a set of four measurements around *Data Center Consolidation*, *Risk Transparency*, *IT Portfolio Review* (i.e., progress against savings targets) and *Incremental Development* (i.e., progress against systems development targets). We felt that this inquiry was important given the comprehensive press coverage and Congressional testimony of several agency CIOs that have been asked to appear in front of Congress to discuss their performance on the Scorecard.

However, as our interviews progressed, we noted government-wide angst surrounding the structure of the Scorecard itself. Some of this angst is undoubtedly the result of poor grades received through the <u>current scorecard</u>. Nonetheless, agencies were outspoken in their view that the current incarnation of the Scorecard fails to empower CIOs, grant them enhanced IT approval authority, or make FITARA implementation consistent throughout the federal government.

While we maintain that adjusting the Scorecard remains the fulcrum of FITARA reform, and that focused Congressional scrutiny should continue to be a valued enforcement tool, we note other factors restricting consistent FITARA implementation, including issues around government-wide accountability, alignment, and overall expectations.

In this paper, we address the root causes of the dissonance surrounding FITARA and provide ten improvement recommendations for Congress, GAO and OMB to consider to accelerate future implementation and enhance oversight.

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Introduction

Twenty years following the signing of the seminal Clinger-Cohen Act, which laid the foundation for the federal government's acquisition and management of IT, and 14 years after the E-Government Act established a Federal Chief Information Officer (then called the Administrator of the Office of E-Government), program failure rates and cost overruns still plague 72-80% of large government IT programs.¹ Some estimate the cost to the taxpayer to be several billions of dollars.

The Federal IT Acquisition Reform Act (FITARA) squarely addresses this disappointing record. The purpose of FITARA is to increase the value to the taxpayer by adapting the cumbersome federal acquisition process to align with major trends occurring in the IT industry.

However, 18 months after the enactment of FITARA, implementation of this key legislation has reached a crossroads. The primary basis to monitor and evaluate progress towards FITARA's goals, the Congressional FITARA Scorecard, has begun to diverge from the specific goals and milestones that OMB has sought to implement across the agencies. This divergence is troublesome and threatens the ability to make progress in implementing these much-needed reforms.

Generally, agencies appreciate the intent of the Scorecard, namely to measure progress against specific outcomes. However, the near-unanimous opinion of Federal IT staff is that the Scorecard is incomplete and fails to collect the right data to assess meaningful progress and outcomes (see Figure 1). Despite

What the Congressional FITARA Obectives Scorecard Measures 1. Agency CIO Authority [No official measure] Enhancements 1. Risk Assessment 2. Enhanced Transparency/Risk Transparency Management 2. Incremental Development 3. Portfolio Review 3. IT Portfolio Review Savings 4. Federal Data Center 4. Data Center Consolidation Consolidation Initiative 5. Expansion of Training and Use [No official measure] of ITCadres 6. Maximizing Benefit of FSSI No official measure 7. Government-wide Software [No official measure] Purchasing Program

the pressure of continued Congressional oversight, it appears that agencies are no longer working towards IT reforms that are captured in the Scorecard.

Instead, agencies are focusing on OMB's Common Baseline, a subjective implementation guide outlining how agencies should meet FITARA objectives, which overwhelmingly focus on enhancing CIO Authority across 17 attributes (Figure 2).

The process-focused Common Baseline lacks coordination with the outcome-driven Congressional Scorecard, leading to an unintended reality: 24 CFO Act agencies are implementing 24 flavors of FITARA. This is exactly what the authors of FITARA had hoped to avoid.

FITARA Objective	OMB Common Baseline Responsibilities					
1. Agency CIO enhancements	A. Visibility of IT Resources					
2. Enhanced transparency/ risk management	B. CIO role in Pre-Budget Submission					
3. Portfolio review	C. CIO Role in Planning Program Management D. CIO Role in Budget Request					
 Federal data center consolidation initiative 						
5. Expansion of training and use of IT cadres	E. Ongoing CIO Engagement with Program Managers					
6. Maximizing the benefit of FSSI	F. Visibility of IT Planned Expenditure Reporting to CIO					
7. Government-wide software purchasing program	G. CIO Defines IT Processes and Policies					
	H. CIO Role on Program Governance Boards					
	I. Shared Acquisition and Procurement Responsibilities					
	J. CIO Role in Recommending Modification, Termination, or Pause of IT Projects					
	K. CIO Review and Approval of Acquisitions					
	L. CIO Approval of Reprogramming					
	M. CIO Approves New Bureau CIOs					
	N. CIO Role in Ongoing Bureau CIO's Evaluations					
	O. Bureau IT Leadership Directory					
	P. IT Workforce					
	Q. CIO Reports to Agency Head or Deputy/COO					
Figure 2. The Common Baseline lists	enablers for one of the seven FITARA mandates,					

Figure 2. The Common Baseline lists enablers for one of the seven FITARA mandates, Agency CIO Authority Enhancements

¹ Testimony of Dave Powner; Implementation of Reform Legislation Needed to Improve Acquisitions and Operations, GAO-16-204T (Nov. 4, 2015).

The Importance of FITARA Reform

Some will question why this review of the Scorecard is important. FITARA, they say, has provided federal CIOs a better seat at the table and control over a larger portion of IT spend. This is indisputable; however, it is only the start of what needs to be done. The government has barely dented, if at all, the billions of dollars in wasted IT spend. The government is better off with a more standard and detailed approach to FITARA implementation, one that applies consistency throughout agencies and provides government with the IT governance attributes that increasingly complex IT deployments now require.

This brings us to a pivotal crossroads. With a looming Presidential Transition and the subsequent exodus of many FITARA-knowledgeable staff, FITARA can go one of two ways: either it goes the way of Clinger-Cohen, becoming an oftignored, costly compliance exercise and additional acquisition step, ultimately failing to properly empower CIOs to control IT spend. Or it is re-invigorated, with CIO authority strengthened and standardized across agencies, improving the efficiency and effectiveness of how federal IT money is spent. The next few months are critical in shaping the future of FITARA.

CIO Authority: An Example of FITARA Inconsistency

A basic tenet of FITARA is establishing CIO approval authority for IT purchases. The intent was to empower agency-level CIOs with authority to drive down superfluous IT spending. If CIOs had the authority to consolidate and control IT procurement under one office, better purchasing decisions would be made and significant waste could be eliminated. Congressional staffers involved in writing the FITARA legislation believe that this attribute - consolidating a CIO's authority over IT spend - is the single most important factor in empowering CIOs and the basis of the legislation.

There are several agencies that have made good progress by explicitly mandating CIO *approval* on major IT purchases above a set threshold.² However, some agencies only require that CIOs have input authority (usually shared with other CxOs) into IT purchasing decisions. How much control can an agency CIO truly have if they can only provide input into IT purchases, but not final approval?

Furthermore, the threshold of where agencies require CIO

² Based on Censeo analysis of publicly available FITARA Implementation plans

approval greatly differs. For example, Agency A requires CIO approval on all purchases above \$5M; Agency B mandates that CIOs approve any purchases above \$50M. Consequently, the first CIO has true authority over what is likely a majority of the agency's IT spend; the latter CIO likely does not.

These differing interpretations of a CIO's approval authority are justified by pointing out that the CIO at Agency A works for a smaller, centralized agency, and has the reach and resources to control a growing proportion of IT spend. The Agency B CIO works at a larger, federated agency, and is forced to delegate authority and save his/her limited resources to review larger IT purchases. What is missing from the equation is a transparent discussion of why the CIO at Agency B has approval authority at a \$50M threshold, when there are CIO counterparts at equally complex, federated agencies with approval authority over much smaller thresholds. That discrepancy is harder to justify, and it advances the narrative of 24 unique implementations of FITARA. It also brings about questions that auditors will invariably ask, such as whether Agency B is truly maximizing the intent of this legislation to augment its CIO authority.

It is understood that a one-size-fits-all FITARA approach cannot work for agencies with differing sizes and missions. As a result, legislators should not mandate that every agency CIO has approval authority on all its agency IT purchases above a fixed, universal threshold. However, there needs to be a more detailed and transparent set of guidelines around how agencies implement CIO Authority enhancements. Such actions would streamline FITARA implementation, avoid large variations in its application, and simplify its auditing by outsiders.

Root Causes of the FITARA Disconnect and Improvement Recommendations

Five root causes explain why FITARA implementation is inconsistent and threatens the legislation's ability to drive long-term change. Additionally, ten recommendations are made to address those gaps and to match the legislation's original intent of empowering CIOs and rationalizing IT spending across the federal government.

ISSUE #1: CROSS-GOVERNMENT ACCOUNTABILITY IS LIMITED

There is no single group truly accountable for FITARA oversight. OMB and GAO lack alignment, the CIO Council's FITARA role is undefined, and there is no central resource tying it all together

from both a strategic and tactical level. Without coordination at the top, there is insufficient knowledge sharing at the lower levels, causing agencies to implement unique and inconsistent flavors of FITARA.

Recommendation 1: Enhance communications across HOGR, GAO and OMB to align oversight focus.

Goals and objectives of the House Committee on Oversight and Government Reform (HOGR), GAO and OMB regarding FITARA oversight and implementation need to be more robust. Without a mutually agreed realignment, agencies and OMB will continue moving in a direction focused on gaining process maturity and using agency self-assessments to tally progress; meanwhile, HOGR and GAO will continue pushing for accountability using limited data sets to populate their metrics. Convening these entities to align on goals, strategies, implementation approaches and metrics, while permanently opening up communication channels, will help re-shape FITARA and improve the likelihood of future success.

Recommendation 2: Clarify FITARA Roles of OMB, the CIO Council, GAO and HOGR, and empower the FITARA Coordinator role.

Today, no single entity is responsible for ensuring consistency in FITARA implementation and oversight. As a result, requirements of the law are applied inconsistently across the government. The goal of this recommendation is to improve the coordination and standardization of FITARA oversight and activities across agencies and have a single, accountable lead for this effort. Roles for the primary entities would be defined as follows:

- OMB would continue to ensure agency FITARA
 goals are consistently implemented, serve as a liaison
 between the agencies and GAO, enhance its focus
 on outcomes (in addition to processes), and confirm
 that GAO has access to the data it needs for audit
 purposes.
- The FITARA Coordinator would lead this effort on behalf of OMB. To properly enable this role, the FITARA Coordinator requires increased authority to enforce FITARA standards across agencies and authorize sign-off on whether an agency is meeting its FITARA goals.
- The CIO Council would take a larger role in FITARA implementation, facilitating the collection of data, assisting in inter-agency FITARA collaboration, and

- identifying and implementing FITARA continuous improvement opportunities. The FITARA Coordinator would report to this stakeholder group.
- GAO would continue to serve as a "trust, but verify" auditor of the government's ability to meet legislative requirements.
- HOGR would continue to provide Congressional oversight to ensure that the goals and objectives of FITARA are properly implemented, unlike the ill-fated Clinger-Cohen framework.

Recommendation 3: Enhance data sharing between OMB and GAO, and collectively re-build the Scorecard.

This recommendation requires a two-fold acceptance that the Scorecard needs to be updated, and that the optimum way to accomplish this is if both OMB and GAO cooperated on the effort. Some will scoff at the overlapping of OMB and GAO, as it is an unusual coupling. Nonetheless, the payoff is significant: OMB possesses better agency-wide data than any other entity. Granting GAO access to this data would help GAO overcome its issue of having minimal and/or poor data to assess agencies. Similarly, OMB can and should provide recommendations on how GAO can build a better, fairer scorecard to audit agencies and ensure progress against all seven congressionally-mandated FITARA objectives, not just a subset of them.

Recommendation 4: Create a formal FITARA Working Council comprised of agency FITARA, leads reporting to the CIO Council.

This recommendation will allow agency FITARA experts to share ideas on policies, progress, data and implementation as well as success stories. Currently, this process occurs informally and is not inclusive of all CFO Act agencies. Consequently, highly portable FITARA efforts performed by leading-edge agencies are failing to find their way to other agencies, further leading to the concern that 24 agencies are implementing FITARA 24 different ways.

Recommendation 5: Hold Agency leaders responsible for FITARA implementation, not just CIOs.

It is unreasonable to expect CIOs to singlehandedly empower themselves, particularly at agencies where CIOs historically control little IT spend. Holding the agency's Deputy Secretary accountable for achieving FITARA goals, in addition to the CIO, will drive home FITARA faster.

ISSUE #2: THE SCORECARD GRADING STRUCTURE IS FLAWED.

Some agencies complain of receiving poor grades with no context or guidance on how to improve them. Other agencies complain of the forced grading curve where a large portion of agencies are pre-determined to receive a "D" or "F". Consequently, agencies have silently rejected the content and structure of the current Scorecard due to concerns on fairness and transparency. Until the Scorecard is modified to reflect an enhanced way to measure agency FITARA performance, this rejection will continue. The scorecard needs to be based on objective outcomes, but must also balance the fact that not all agencies are created equal, with some starting from deeper deficits than others. A one-size-fits-all grading approach fails to acknowledge agency variations in

history, culture and mission, and cannot be accurately portrayed by objective assessments that lack context.

Recommendation 6: Reassess the Scorecard methodology

Factor progress into score. Many agencies decried the Scorecard's lack of acknowledgement for often herculean efforts to overcome the antiquated legacy IT systems with which they were saddled. For example, one agency closed hundreds of data centers, but could not claim the savings because the data centers were re-purposed for other

internal agency uses. Consequently, it earned a very low score in the *Data Center Consolidation* category. Despite intense efforts to meet the spirit of FITARA, the poor grades alienated the agency from the Scorecard. Highlighting progress and effort in the next version of the Scorecard rewards and incentivizes better future behavior.

Introduce customized target goals for agencies. Some outcomes may be easily proxied by a set of objective metrics using data available to GAO. For example, there appears to be little dissension over how GAO calculates the *Risk Assessment Transparency* metric. However, there is no consensus over what the metric means, and whether a higher amount of risk reported is good or bad. Right now, agencies that report little risk are punished by the Scorecard, with the default assumption being that they underestimate their risk. Many agencies counter that they have successfully reduced risk because of good management and decision-making. As a result of this stalemate, several agencies have requested more subjectivity in determining grades,

as OMB allows via self-assessments on the Common Baseline. However, from an audit perspective it is difficult to introduce the subjectivity of self-assessments into the scoring as it allows for inconsistency.

The remedy is to introduce custom, agency-specific targets for each metric to be agreed upon between OMB and GAO, with input from the individual agency. This would acknowledge that each agency's starting point is different while holding them to a realistic, objective and auditable standard. The agency would then be graded on its ability to make progress against the target. An agency with a historically large amount of risk, but one that has continuously reduced its risk over time, should be rewarded. An agency with very low historical risk, but one that has backslid, should not be rewarded.

"The government has barely dented, if at all, the billions of dollars in wasted IT spend. The government is better off with a more standard and detailed approach to FITARA implementation, one that applies consistency throughout agencies and provides government with the IT governance attributes that increasingly complex IT deployments now require."

Remove forced grading curves.

One of the loudest Scorecard complaints was around the grading curve used to determine agency grades with the *Risk Assessment Transparency* rating. Recipients deemed it to be an excessively harsh way to grade agencies, with no less than nine of 24 agencies designated to receive a "D" or "F" before any data was received. Removing this forced scoring would elevate agency confidence in the Scorecard.

ISSUE #3: INCONSISTENT FOCUS OF FITARA IMPLEMENTATION OBJECTIVES

As shown in Figures 1 and 2, what OMB is asking agencies for is different than what GAO is asking for. OMB's Common Baseline attributes focus on processes that enable CIO authority and are only subjectively measured through agency self-assessments. On the other hand, GAO's Scorecard focuses on objective outcomes (e.g., cost savings, reduction of risk, etc.). Interviews with federal IT stakeholders indicate that agencies are more focused on gaining OMB-mandated process maturity rather than GAO-focused outcomes. However, neither methodology fully addresses the seven FITARA objectives.

Recommendation 7: Revamp current Scorecard metrics to incentivize better outcomes.

There are currently four Scorecard metrics: *Data Center Consolidation, Incremental Development, IT Portfolio Savings* and *Risk Assessment* Transparency. All are, in theory, valid proxies of CIO authority and performance and meet at least one of

the seven FITARA mandates. However, agencies complain that the current metrics do a poor job of incentivizing the right outcomes. One oft-repeated theme with agencies that score poorly on the Scorecard is that they did not know what further behavioral changes they should make despite getting a "D" or "F", and therefore cannot address them. These four metrics should be individually reviewed and adjusted to incentivize desired outcomes. For example, with *Data Center Consolidation*, the new Scorecard should line up its metrics directly with the *Optimization, Data Center Closures* and *Cost Savings* objectives outlined in <u>OMB Memo M-16-19</u>. Each agency should be provided its own unique Data Center initiative targets and assessed against those targets. This will prevent agencies that have completed their Data Center consolidation efforts from being punished (with a "C", "D" or "F") for being unable to do more.

For the other three metrics, *Incremental Development*, *IT Portfolio Savings* and *Risk Assessment Transparency*, OMB and GAO should determine if it makes sense to keep them or to scrap them altogether and create new ones. OMB may have access to better

data that would enable GAO to potentially use different metrics to measure FITARA Objective 2 (Enhanced Transparency / Risk Assessment) and Objective 3 (Portfolio Review). Revisions to these legacy metrics must be collectively explored by OMB and GAO.

Recommendation 8: Expand the Scorecard to capture new metrics and incentivize new behaviors.

An agency that earns all "A"s on the current Scorecard would not provide a complete view into its FITARA readiness. That is because the Scorecard does not measure enough areas to give it a holistic view of an agency's true IT performance. It is the equivalent of determining the winner of a basketball game by calculating which team has a better free throw shooting percentage. It may tell you who won, but with low confidence. From a long term perspective, OMB and GAO need to expand the Scorecard to incentivize future desired FITARA behaviors. These include metrics that continue to gage the transition of federal CIOs from formerly technical and support roles to being a key strategic advisor within the agencies. Suggested FITARA-enhancing metrics are shown in Figure 3.

FITARA Objective	CIO Authority Enhancement	Enhanced Transparency	Portfolio Review (Cost Savings)	Data Center Consolidation	Expansion of training	Maximizing FSSI	Government Wide Software	
New Suggested Metrics								
IT Acquisition Spend - Calculates amount of IT spend centrally managed by CIO	✓							
IT Sourcing Spend – Calculates amount of IT spend under government- or department-wide contracts						√	✓	
IT Shadow Workforce – Calculates % of IT staff not directly controlled by CIO or OCIO		✓						
Modernization of Legacy Systems – Calculates % completed of mission-critical systems that need to be modernized in next three years		✓	1					
Operating-to-Capital Spend Ratio – Calculates ratio of O&M/DME to proxy whether IT funds are being spent on fixing deficiencies		✓	✓					
% of Trained Staff - Calculates % of certified IT staff in cyber-security, project/program management and Agile.					√			
Current Scorecard Metrics								
Data Center Consolidation				✓				
Incremental Development		✓						
IT Portfolio Review Savings			✓					
Risk Transparency		✓						

Agency Perceptions of Congressional FITARA Scorecard

"The Scorecard does not measure process maturity or recognize effort."

"We're doing the right thing and driving results, but not seeing our grades improve."

"Agencies that come to [my agency] for advice on data center consolidation are getting higher scores than my agency!"

"There is a lot of good work that is not being recognized or rewarded."



"The data center metric does not reward organizations for eliminating data centers."

ISSUE #4: LACK OF IMPLEMENTATION GRANULARITY

Agencies have been allowed to customize FITARA implementation to suit their culture and mission. While this is an admirable strategy, it has potentially gone too far, to the point that agencies are implementing FITARA inconsistently. It is why one agency will have detailed FITARA templates and dashboards for lower-profile IT activities such as 508 Compliance, Customer Service, and Privacy, while other agencies pay no heed to this level of detail. This causes inconsistency in the way FITARA is applied.

Recommendation 9: Encourage OMB to take a more prescriptive role in the FITARA implementation process.

This includes outlining policies and expected outcomes at the same level of detail as the recent memorandum from OMB (M-16-19) on data center optimization. Optimizing and reducing the data center footprint are key provisions in FITARA, and with respect to this aspect of FITARA implementation a clear, detailed and persuasive roadmap has been spelled out by OMB, leaving no doubt as to the expectations. Similarly, detailed roadmaps are essential to meet the other six objectives required by the FITARA legislation. This will allow agencies to converge on similar behaviors and sought-after outcomes. It will also enable a more easily-auditable Scorecard.

ISSUE #5: LIMITED PUBLICLY AVAILABLE DATA

GAO has limited access and resources to precisely audit the

FITARA performance of 24 agencies. Consequently, they depend on publicly available data, which may or may not be fully reliable, and differs in quality from OMB's treasure chest of data. The inability for GAO to find sources of reasonable data prevents them from objectively assessing agency performance against outcomes. As a result, the current Scorecard is lightly regarded, leaving an important tool for FITARA accountability ignored.

Recommendation 3 (repeat): OMB and GAO should share relevant data and collectively re-build the Scorecard.

The third recommendation in white paper (see page 8) outlined the value of OMB and GAO sharing data in order to build a better Scorecard and enhance FITARA reforms. As a specific example of potential data that can be shared between the two entities, the Office of Federal Procurement Policy (OFPP) at OMB has collected "Spend Under Management" metrics from each of the CFO Act agencies. These metrics calculate the amount of IT spend channeled through well-managed, government-wide contracts and vehicles. Similarly, OMB collects performance metrics as part of its Category Management program. Should these datasets be available to GAO it can be used to proxy potential IT Acquisition Scorecard metrics and enable the assessment of agency-wide compliance to FITARA Objectives 6 (Maximizing the Benefit of the Federal Strategic Sourcing Initiative) and 7 (Government-wide Software Purchasing Program).

Recommendation 10: Enhance transparency by implementing a universal IT cost taxonomy.

The federal government suffers from an inability to draw direct apples-to-apples IT cost comparisons across agencies. Previously attempted cost benchmarks rely on agency self-reported data that may or may not use standard – or even accurate – cost approaches. Adopting and implementing a universal IT cost taxonomy will make it easier to compare and contrast costs per agency, helping to identify areas of waste and duplication, and accelerating its removal. While this is a longer-term aspirational requirement, it should not be downplayed. Without it, agencies may continue to write-off underperformance relative to other agencies due to perceived differences in methodology.

Conclusion

The roles of the Scorecard and subsequent Congressional oversight hearings were instrumental in driving the necessary policy and cultural changes required to repair the inefficient ways agencies misallocated and misapplied scarce IT resources. It was a good start and worked to direct focus and pressure on the need to keep IT acquisition and deployments reforms alive and well into the 114th Congress.

However, it is time to move to the next level with FITARA implementation. Congressional scrutiny is essential to

maintaining the momentum necessary to truly reform the federal IT landscape, and many in Congress have pledged to continue the intense oversight focus. An updated and expanded Congressional Scorecard, along with better cooperation between the Executive Branch (OMB) and the Legislative Branch (Congress and GAO), an enhanced accountability structure, and improved access to data will play a key role in keeping this process transparent and effective into the next Administration. These enhancements are captured through ten recommendations outlined in this document.

These recommendations will come at a cost for all parties involved. OMB is being asked to take on a larger, more authoritarian role in FITARA. Agencies, many of them comfortable with their self-selected approach to FITARA, are being requested to conform to a more standard, prescriptive roadmap than before. GAO is being asked to add nuance to an enhanced Scorecard. But the costs and temporary discomfort this may bring about will be dwarfed by the potential return. If a mere 5% of the billions in wasted IT spend can be stripped out and redirected to other mission-critical activities, or returned to the Treasury, it would amount to a game-changing amount of savings. Those are outcomes foreseen by the FITARA legislation, and what the Federal Government should continue aspiring to achieve through the reinvigoration of FITARA into the next Administration.

FITARA RECOMMENDATIONS

- 1. Enhance communications across HOGR, GAO and OMB to align oversight focus
- 2. Clarify FITARA Roles of OMB, the CIO Council, GAO and HOGR, and empower the FITARA Coordinator.
- 3. Enhance data sharing between OMB and GAO, and collectively re-build the Scorecard.
- 4. Create a formal FITARA Working Council reporting to the CIO Council
- 5. Hold Agency leaders responsible for FITARA implementation
- 6. Re-assess the Scorecard methodology
 - Factor Progress Into Score
 - Introduce customized target goals for agencies
 - Remove Forced Grading Curves
- 7. Re-vamp current Scorecard metrics to incentivize better outcomes.
- 8. Expand the Scorecard to capture new metrics and incentivize new behaviors
- 9. Encourage OMB to take a more prescriptive role in the FITARA implementation process
- 10. Enhance Transparency by Implementing a Universal IT Cost Taxonomy

