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Comments Received :

- Based upon my interpretation, I'm not certain if this would apply to a majority of our HW/SW portfolio (on Contracts side) as most are open source/ publicly accessible. I am not certain if the word "freely" means literally without cost, or means open market/ COTS. Perhaps clarification here on the draft would be helpful.

- It may also be beneficial to include the NDAA 889 "check". While a majority of the components in this attestation mirror the requirements in the NDAA certification, this designation is a required field when procuring through AQM or through a government credit card.

Section 889 Policies | Acquisition.GOV

- Will there be a repository of attestation that is accessible to the Department? Would be redundant/ inefficient to require each Bureau/Agency to pursue these individually.

- Does the statement below mean that FEDRAMP-approved systems have inherently met the requirements outlined in this attestation, and just need to be signed off? Or will this be integrated into the FEDRAMP process?

"OR

A Third Party Assessor Organization (3PAO), either FedRAMP-certified or approved in writing by an appropriate agency official, has evaluated our conformance with all elements in this form. The 3PAO used relevant NIST Guidance that includes all elements outlined in this form as part of the assessment baseline. The assessment is attached. "

- Is there an "expiration" of an attestation form? While the form states the trigger for needing a new form, is there a general timeline for review/ audit of original submissions (i.e. 5 years)?