PART I: CAPITAL ASSET PLAN AND BUSINESS CASE (All Assets)

·	
Steady State	
tally _ Fully _x_	
. No _x	
_ No	
No	
No	
No x	
. Nox_	
No	•
. No _x_	
No	

No	
. No	
. No _x_	
_ No _ P	138
-	No _x

	d.1 If yes, were any weaknesses found?d.2. Have the weaknesses been incorporated into the agency's					-	No	_x
corrective action plans?				Yes	-	No		
this project been identified as a national critical operation or y a Project Matrix review or other agency determination? * tions for NRC's Project Matrix Review are just underway. The will not be completed until the first Quarter FY 2003, at the earliest.					*		No	_X_
e.1 If no, is this an a service, system, o documented in the identified above a	peration, e agency's	or asset (s	such as the	hose er than those	Yes		No	_x_
		es for BY-	(1 1 and b	DING FOR P in Millions) eyond are for p present budget	planning pur			
	PY-1 and Earlier	PY 2002	CY 2003	BY 2004				Total
Planning:								
Budgetary Resou	rces		•					
Outlays								
Acquisition:								
rioquisicon .								
Budgetary Resour	ces	.020						
Budgetary Resour		.020 .020						
Budgetary Resour Outlays Total, sum of stages Budgetary Resour	:	,,_,			ž.			
Budgetary Resour Outlays Total, sum of stages	:	,,_,	.100	.100	÷			
Budgetary Resour Outlays Total, sum of stages Budgetary Resour Outlays Maintenance: Budgetary Resour	: ces	,,_,	.100	.100	<i>t</i>			
Budgetary Resour Outlays Total, sum of stages Budgetary Resour Outlays Maintenance:	: ces	,,_,	.100	.100				

I. A. Project Description

1. Provide a brief description of this project and its status through your capital planning and investment control (CPIC) or capital programming "control" review for the current cycle.

The is the initial Exhibit 300 for the ITIPS Pilot Project which is in the conceptual phase of the CPIC life cycle.

ITIPS is an automated database that is used to manage an agency's IT investment portfolio as required by the Clinger-Cohen Act that established the requirement for the each agency to implement a Capital Planning and Investment Control process (CPIC). ITIPS development and continued maintenance is funded by an interagency consortium.

The merits of ITIPS as identified on the ITIPS Resource Center website are as follows:

Features:

Allows understanding of agency IT strengths and weaknesses from an Organizational, Life Cycle, Business Mission, Business Stratic, IT Strategic, Risk Management, and Service perspective.

Single source for executive-level investment information Multiple ways of viewing and categorizing investments Agency-defined criteria for evaluating IT investments Consolidated information on risk and return Multi-level security access Automatic generation of OMB Reports (300, Exhibit 52, Exhibit 53)

Structure compatible with GAO's IT Capital Planning Process

Benefits:

Creates a self-documenting business case for investments Provides a central source of cost, risk, mission support information

Allows agency to:

Access to up-to-date information about individual IT capital planning initiatives

Access to up-to-date information about the entire IT Investment portfolio

Assess impact of modifying IT capital investment portfolio on organizations

Focus IT capital investments on critical missions, goal, and Objectives

For a small agency the major benefit of ITIPS in the past has been the feature allowing automated submission of budget Exhibits 53 and 300 to OMB. Because in the past, NRC has only had to track four major IT systems, and to report via the 300 on the same four projects, it has not seemed cost-effective to install ITIPS and pay the \$100,000 plus annual maintenance fee.

Beginning with the FY 2004 budget, OMB is requiring reporting on 60% of the agency's IT budget via the 300s. This will require 34 separate 300s and that 34 IT portfolio expenditures be monitored. It would seem, a priori, cost-effective to track these expenditures with ITIPS and to use the features of the software to update and transmit the 300s to OMB.

Unfortunately, little information has been collected on the costs of initially populating the database once the database has been installed. NRC OCIO research has been unable to obtain from ITIPS sponsors, a definitive estimate of the level of staff resources required to implement and administer ITIPS.

[The paragraphs within the brackets were added Feb. 14,-2003 - On February 6, 2003, NRC met with the Government Project Manager for ITIPS, the ITIPS contractor, and representatives from three other "small agencies" to discuss options for right sizing the cost and implementation complexities for small agencies. Possible options included each small agency hosting the application inhouse or acquiring through joint purchase and hosting elsewhere either at one of the agencies or at an Application Service Provider (ASP). In either case, some minor customization might be possible. For example, the possibility of modification to allow the smaller agencies the full functionality of the Exhibit 300 portion of the ITIPS was discussed.

The Project Manager and the contractor discussed plans for a major reengineering of ITIPS (designated as ITIPS-2) scheduled to be accomplished in time for the FY 2006 budget submission. ITIPS-2 would be right sized in the sense that the more complex features could be turned on or not, depending on an agency's requirements. This would appear to be a major step toward making it cost-effective for smaller agencies to adopt ITIPS.

A general consensus was reached during the meeting was that attempting a major customization of ITIPS for smaller agencies in time for the FY 2005 budget submission would not be cost-effective, and would likely negatively impact the schedule for ITIPS-2. The meeting concluded with the following actions items (1) ITIPS contractor will evaluate the cost and feasibility of a minor customization of ITIPS to support small agency adoption in time for the FY 2005 budget, and (2) The meeting and its outcome will be discussed at the next Small Agency Council meeting.

For purposes of this Exhibit 300, the ITIP pilot is defined as adopting for the FY 2005 budget cycle, the minor customized ITPS-1 and following the progress of ITIPS-2 development closely enough to understand the potential cost, benefits, and risks of implementing ITIPS-2.

The purpose of the ITIP pilot is to install the software (or contract for access, if the ASP option becomes available), become familiar with it, obtaining enough information from the pilot to estimate the true costs of the system. With that information, we plan to prepare a business case for acquiring and implementing ITIPS.]

2. What assumptions are made about this project and

OMB will continue to issue requirements that favor use of an automated IT investment portfolio.

A collection of smaller government agencies will determine a way to share an installed version of ITIPS, such that its annual cost will be around \$100,000 rather than the \$120,000 charged to the large agencies currently supporting the system.

3. Provide any other supporting information derived from research, interviews, and other documentation.

OCIO staff has met with the ITIPS program manager, viewed a demonstration of ITIPS and viewed a demonstration of a competitor software product that provides some of the functionality of ITIPS.

I.B. Justification (All Assets)

Question 1 – How does this investment support your agency's mission and strategic goals and objectives

NRC Mission: To regulate the Nation's civilian use of byproduct, source, and special nuclear materials to ensure adequate protection of the public health and safety, to promote the common defense and security, and to protect the environment.

NRC's Strategic Goals	NRC Strategies	Supports	How Does Your Initiative Support
			this NRC Goal or Corporate
			Management Strategy?
Nuclear Reactor Safety: Prevent radiation-related deaths			•
			•
and illnesses, promote the			
common defense and security,	·		
and protect the environment in the use of civilian nuclear			
reactors.			·
2. Nuclear Materials Safety:	e de la companya de		•
Prevent radiation-related deaths and illnesses, promote the			
,			
common defense and security,			
and protect the environment in			
the use of source, byproduct, and special nuclear material for			
special nuclear material for medical, academic, and			·
industrial purposes			
3. Nuclear Waste Safety: Prevent adverse impacts from			•
radioactive waste to the current			
and future public health and			
safety and the environment, and			
promote common defense and			
security			
4. International Nuclear Safety			
Support: Support U.S. interests		,	-
in the safe and secure use of			
nuclear materials and in nuclear	The second secon		
non-proliferation			·
NRC Corporate Management			
Strategy 1: Employ innovative			
and sound business practices	·		
NRC Corporate Management			•
Strategy 2: Sustain a high-	* .		
performing, diverse workforce.			
NRC Corporate Management		X	Automated IT investment
Strategy 3: Provide proactive			portfolio allows cost-effective
information management and			monitoring, timely reporting,
information technology services.			and efficient data collection for decision making.
NRC Corporate Management			
Strategy 4: Communicate			
strategic change.			

[•] Question 2 - How does it support the strategic goals from the President's Management Agenda? All.

Presidents Management Agenda (PMA)	Supports	How Does Your Initiative Support This PMA Item?
Human Capital		
Competitive Sourcing		
Financial Performance		
E-Government		
Budget and Performance Integration	X	

Question 3 - Are there any alternative sources in the public or private sectors that could perform this function?

Yes, there is a software package that has some of ITIPS capabilities.

Question 4 -- If so, explain why your agency did not select one of these alternatives.

The current plan is to "pilot" the ITIPS. We will simultaneously investigate alternatives to ITIPS.

QUESTION 5 - WHO ARE THE CUSTOMERS FOR THIS PROJECT

AND

QUESTION 6 - WHO ARE THE STAKEHOLDERS OF THIS PROJECT?

The ITIPS will be used to make decisions on IT investments that are used by most offices in the agency.

Question 7 – If this is a multi-agency initiative, identify the agencies and organizations affected by this initiative.

Although development and enhancement is funded by many agencies, each agency budgets for its own copy of ITIPS. However, there has been discussion about joint funding for one "license" by a group of smaller agencies, to reduce costs.

Question 8 - How will this investment reduce costs or improve efficiencies?

The purpose of the ITIPS pilot is to determine whether it is cost-effective and will provide efficiencies. The pilot will include a business case analysis of ITIPS and its alternatives.

Question 9 – List all other assets that interface with this asset. Have these assets been reengineered as part of this project?

No.

I.C. Performance Goals and Measures (All Assets)

Near term plans are to acquire ITIPS for a pilot evaluation.

	Strategic Goal(s) Supported	Existing Baseline of Perform- ance goal	Planned Performance Improvement Goal	Actual Performance Improvement Results	Planned Performance Metric	Actual Performance Metric Results
Y02	NRC Corporate Management Strategy 3: Provide proactive information management and information technology services.	NRC has no automated IT portfolio system.	Acquire ITIPS.		Acquire ITIPS	
Y03	NRC Corporate Management Strategy 3: Provide proactive information management and information technology services.	NRC has limited understanding of ITIPS capabilities and does not know cost of implementing and operating ITIPS.	Evaluate ITIPS in pilot mode. Prepare business case. Implement if business case justifies.		Evaluate ITIPS in pilot mode. Prepare business case. Implement if business case justifies	
Y04	NRC Corporate Management Strategy 3: Provide proactive information management and information technology services.	Staff not trained in ITIPS. Management not used to working with automated portfolio management system	Empower staff and management to make maximum cost-effective use of ITIPS		IT contact person from each office can use ITIPS with minimum OCIO or contractor support.	

I.D. Program Management (All Assets)

Question 1 - Is there a program manager assigned to the project? If so, what is his/her name?

Yes. John Sullivan, Senior Program Analyst

Question 2 – Is there a contracting officer assigned to the project? If so, what is his/her name?

Yes. Myron Kemerer, Senior IT Acquisition Specialist

Question 3 -- Is there an Integrated Project Team? If so, list the skill set represented.

Currently there is no IPT However, one will be formed. In addition to the program manager and the acquisition specialist, OIOC technical evaluation staff and one individual from as least two program offices will participate in the pilot.

Question 4 - Sponsor / Owner:

Stuart Reiter, Chief Information Officer

5.0 PART II. ADDITIONAL BUSINESS CASE CRITERIA FOR INFORMATION TECHNOLOGY

II.A Enterprise Architecture

NRC's ITIPS is in the conceptual phase. However, ITIPS is an OCIO project supporting portfolio management and the CPIC process. The NRC Enterprise Architecture (EA) staff works closely with the CPIC staff, and both recognize the need to add ITIPS functionality to the NRC EA. EA staff members participated in the February 6 small agency ITIPS meeting and are working with the CPIC staff to take the preliminary steps necessary to add ITIPS to the NRC EA. Additionally, NRC's EA staff is participating in OMB's FEA development and working to ensure that all layers of the FEA, as they become available, are integrated into NRC's EA. Back office support for investment planning through utilization of specific FEA components is an integral part of the FEA that will be supported at NRC through acquisition of ITIPS utilizing the least redundant most cost-effective vehicle available. We are collaborating with other small agencies now to apply a cross-agency approach and expect to influence the ITIPS-II developers to provide an approach that will enable small agencies to utilize the ITIPS functions most needed while reducing the need for duplicative individual agency investments in copies of the full ITIPS system.

II.A.1 BUSINESS

Question A -- Is this project identified in your agency's enterprise architecture? If not, why?

ITIPS will serves as a core information technology investment portfolio system for the NRC. The NRC will acquire ITIPS through a multi-agency vehicle if hosted in house. If acquired through a joint purchase with other small agencies, ITIPS may be hosted elsewhere. Because ITIPS is a new initiative, it has not yet been named in the NRC's enterprise architecture. However, as a cross-servicing, interagency application, recommended by OMB and integral to the FEA, NRC's EA staff is taking the steps now to add ITIPS to the

agency's enterprise architecture. Addition of ITIPS will be part of the effort to update NRC's EA to integrate the layers of the FEA, especially components such as ITIPS.

Question B. Explain how this project conforms to your departmental (entire agency) enterprise architecture.

The NRC EA is being upgraded to become compliant with the FEAF and integrate the layers of the FEA as they become available. being used emphasizes taking full advantage of OMB initiatives and requirements so as to leverage the work being done by OMB and CIO Council's committees. The NRC Enterprise Architecture (EA) staff works closely with the CPIC staff, and both recognize the need to add ITIPS functionality to the NRC EA. EA staff members participated in the February 6 small agency ITIPS meeting and are working with the CPIC staff to take the preliminary steps necessary to add ITIPS to the NRC EA. Additionally, NRC's EA staff is participating in OMB's FEA development and working to ensure that all layers of the FEA, as they become available, are integrated into NRC's EA. Back office support for investment planning through utilization of specific FEA components is an integral part of the FEA that will be supported at NRC through acquisition of ITIPS utilizing the least redundant most cost-effective vehicle available. Our use of ITIPS will enable us to realize greater efficiencies in preparing our responses for OMB related to capital planning submissions. At the same time, we recognize that our use of ITIPS is still at the conceptual stage and the mode of ITIPS pilot implementation must be determined in collaboration with other agencies hoping to participate in an ITIPS pilot. The preliminary information provided about ITIPS by the Booz Allen Hamilton vendor indicates that ITIPS will conform to NRC's EA. However, we realize that ITIPS-II is still being developed and decisions must be made by OMB, stakeholder agencies, and the vendor before complete information will be made available and we can provide specific answers related to EA conformance in hardware, software, standards, etc. to the NRC Interim Enterprise Architecture Review Board.

Question C – Identify the Lines of Business and Sub-Functions within the Federal Enterprise Architecture Business Reference Model that will be supported by this initiative.

The FEA BRM lines of business and subfunctions for ITIPS follow:

Support Delivery of Services Planning and Resource Allocation Subfunction Capital Planning

Question D - Briefly describe how this initiative supports the identified Lines of Business and Sub-Functions of the Federal Business Architecture.

ITIPS supports the OMB requirements for submission of capital planning documentation such as the business case, 52 and 53 in XML.

Question E - Was this project approved through the EA Review committee at your agency?

The agency has an NRC Interim Architecture Review Board that reviewed this project and approved it at the conceptual stage based on general preliminary knowledge of ITIPS and vendor-disclosed plans for ITIPS-II. This approval recognizes that NRC's ITIPS pilot is still at the conceptual stage, and that all information relevant to the use and implementation of ITIPS is not yet finalized and available for review. We are also still undecided as to whether to jointly purchase a copy of ITIPS to be hosted elsewhere or whether to buy and maintain a copy in-house. However, our clear preference is for utilization of a cost-effective small agency version of ITIPS-II, and we are collaborating with other small agencies to achieve that goal. As one of the "larger" small agencies, we would

expect our investment in the collaborative small agency version of ITIPS to exceed that of some others so are planning appropriately.

Question F – What are the major process simplification/reengineering/design projects that are required as part of this initiative?

NRC strives to avoid automation of existing processes without creation of more efficient and effective solutions that fully leverage technology. However, because the ITIPS project is still at the conceptual stage, to date we have not yet identified specific process simplifications that should be possible.

Question G – What are the major organization restructuring, training, and change management projects that are required?

Our NRC project officers will require training on the ITIPS system in order to use it effectively. Change management issues will be addressed as the project moves into the planning stage.

Question H - What are the lines of business involved in this project?

The NRC lines of business involved in this project are represented in the NRC Enterprise Model. ITIPS will support capital planning. We are working with the ITIPS vendor to determine the extent of its portfolio management capabilities and ways in which we might leverage ITIPS.

Question I - What are the implications for the agency business architecture?

We do not anticipate that ITIPS will bring about any major changes in NRC's business architecture. However, NRC strives to avoid automation of existing processes without creation of more efficient and effective solutions that fully leverage technology. Because the ITIPS project is still at the conceptual stage, to date we have not yet identified specific business process simplifications and improvements that should be possible. As the ITIPS pilot moves into the planning stage, business architecture changes will be fully addressed.

II.A.2 Data

Question A -- What types of data will be used in this project?

We will define core data elements for ITIPS according to OMB requirements for each year's 300 submissions. We expect that OMB will provide us with updates as necessary.

Question B -- Does the data needed for this project already exist at the Federal, State, or Local level? If so, what are your plans to gain access to that data?

ITIPS will support NRC internal capital planning. We will input our internal data in the format required by OMB.

Question C – Are there legal reasons why this data cannot be transferred? If so, what are they and did you address them in the barriers and risk sections above?

We will use ITIPS to support our internal NRC capital planning processes and submissions to OMB.

Question D -- If this initiative processes spatial data, identify planned investments for spatial data and demonstrate how the agency ensures compliance with the Federal Geographic Data Committee standards required by OMB Circular A-16.

This initiative does not process spatial data.

II.A.3 APPLICATION AND TECHNOLOGY

Question A -- Discuss the initiative/project in relationship to the application and technology layers of the EA. Include a discussion of hardware, applications, infrastructure, etc.

The current version of ITIPS has been implemented by other Federal agencies utilizing database management system software that is named in the technology layer of NRC's EA since both Sybase and MS SQL server are currently used at NRC. However, since it is a new initiative, the ITIPS application has not yet been named in NRC's EA applications layer. The specifics of ITIPS-II, the version that NRC will pilot, are not yet known completely. However, the Booz Allen Hamilton ITIPS vendor indicates that the architecture of the new ITIPS-II is likely to comply with NRC's application and technology layers of the EA. Since specifics are not yet concrete and available for ITIPS-II, we cannot guarantee compatibility until definite information is provided to us upon which to base an evaluation. However, the NRC CPIC staff lead is collaborating with other small agencies and the NRC EA staff to ensure that the hardware and software of the NRC ITIPS pilot will be compatible with both the application and technology layers of NRC's EA. In addition, the efforts being made to participate in a II, we cannot guarantee compatibility until definite information is provided to us upon which to base an evaluation. However, the NRC CPIC staff lead is collaborating with other small agencies and the NRC EA staff to ensure that the hardware and software small agency system to be utilized by a group of small agencies comply with the spirit of NRC's EA in attempting to avoid redundant purchases and small systems customized for a single user. ITIPS-II will accept SQL queries, support XML, and return reports through a web-based user interface built with discrete components, a direction taken by NRC's future three-tiered web architecture. A library of support documents will be available and collaboration amongst ITIPS users will be possible. The software supports tracking of agency submissions through the various phases such as the evaluation phase. ITIPS will enable the XML submissions of agency capital planning documents as required by OMB.

Question B -- Are all of the hardware, applications, and infrastructure requirements for this project included in the EA Technical Reference Model? If no, please explain.

The hardware, underlying database management applications, and infrastructure requirements for ITIPS current version are included in NRC's Technical Reference Model (TRM). The current version of ITIPS has been implemented by other Federal agencies utilizing database management system software that the TRM specifically names since both Sybase and MS SQL server are currently used at NRC. However, since it is a new initiative, the ITIPS application has not yet been named in NRC's EA applications layer. The specifics of ITIPS-II, the version that NRC will pilot, are not yet known completely. However, the Booz Allen Hamilton ITIPS vendor indicates that the components-based architecture of the new ITIPS-II is likely to comply with the future technologies named in the short-term target architecture of NRC's TRM, specifically NRC's three-tiered web architecture with a focus on thin clients, separated presentation, services, and information layers, and XML.

II. B. Security and Privacy

- NOTE: Each category below must be addressed at the project (system/application) level, not at a program or agency level. Referring to security plans or other documents is not an acceptable response.
- II.B.1. How is security provided and funded for this project (e.g., by program office or by the CIO through the general support system/network)?

NOTE: .The proposed investment is in the conceptual phase. In the Project Description and Enterprise Architecture Sections, two alternative acquisition approaches were discussed as possibly cost effective for smaller agencies like the NRC (1) Each small agency would host the application inhouse or (2) Agencies would acquire through joint purchase and the system would be hosted elsewhere either at one of the agencies or at an Application Service Provider. This security discussion relates to the first option, hosting ITIPS inhouse. The ASP option is not defined well enough at this point to be definitive about security requirements. If the ASP option is selected, the security section will be revised.

The provision and funding for security for ITIPS will be provided by the Office of the Chief Information Officer. For this discussion as noted above, it is assumed that ITIPS is planned to be an application that runs on the agency's local area network (LAN) general support system (GSS), and therefore will make use of the security services provided by the agency-wide LAN infrastructure. CIO provides funding to pay for the security services provided by the agency's LAN.

A. What is the total dollar amount allocated to security for this project in FY 2004?

The ITIPS pilot project is still in the conceptual phase. Allocation of infrastructure security expenses will be made after the pilot is installed

II.B.2 Does the project (system/application) meet the following security requirements of the Government Information Security Reform Act, OMB policy, and NIST guidance?

The ITIPS pilot will run on the agency's accredited local area network, which is fully compliant with GISRA, OMB policy, and NIST guidance. The LAN was accredited in July 2002.

A. Does the project (system/application) have an up-to-date security plan that meets the requirements of OMB policy and NIST guidance? What is the date of the plan?

Security services are provided for this application by the underlying agency-wide local area network. The LAN has an up to date Security Plan, July 2001. However, this conclusion will be validated for the ITIPS pilot is planned to be accomplished prior to installation, tentatively planned for August, 2003.

B. Has the project undergone an approved certification and accreditation process? Specify the C&A methodology used (e.g., NIST guidance) and the date of the last review.

Accreditation for this application will be covered by the accreditation for the underlying general support system local area network. The agency-wide local area network has gone through an approved certification and accreditation process that made use of NIST guidance. The LAN was accredited in July 2002.

C. Have the management, operational, and technical security controls been tested for effectiveness? When were most recent tests performed?

All management, operational, and technical security controls for the LAN were tested for effectiveness during the certification testing and accreditation of the underlying local area network, completed in July 2002.

D. Have all system users been appropriately trained in the past year, including rules of behavior and consequences for violating the rules?

The ITIPS pilot application does not contain classified or sensitive information, and so the ITIPS pilot does not have any specialized security training. However, all NRC staff are required to attend an annual security awareness and training program to ensure that personnel involved in managing and using electronically stored information are aware of security rules, their responsibilities and the proper incident reporting procedures.

E. How has incident handling capability been incorporated into the system, including intrusion detection monitoring and audit log reviews? Are incidents reported to GSA's FedCIRC?

Security services will be provided for this project by the CIO through the general support system/network. The ITIPS pilot is included in the general support systems incident handling methodology and FedCIRC reporting is included. The NRC CIO has an incident handling capability and intrusion detection monitoring capability in place on the existing local area network. Incidents are reported to FedCIRC.

F. Is the system operated by contractors either on-site or at a contractor facility? If yes, does any such contract include specific security requirements required by law and policy? How are contractor security procedures monitored, verified, and validated by the agency?"

Our current assumption is that the ITIPS pilot will not be operated by contractors; it will be operated and maintained by government staff. The assumption will be validated prior to installation, tentatively planned for August, 2003.

II.B.3 How does the agency ensure the effective use of security controls and authentication tools to protect privacy for those systems that promote or permit public access?

There will be no public access to the ITIPS pilot nor to the fully operational system should the NRC decide to implement it. Security controls for the underlying network were tested during the system certification and accreditation process completed in July 2002.

II.B.4 How does the agency ensure that the handling of personal information is consistent with relevant government-wide and agency policies.

The handling of personal information in the ITIPS system will be in accordance with System of Records requirements and fully complies with all government-wide and agency policies. This is verified during the screening process associated with capital planning and investment control (CPIC).

II.B.5 If a Privacy Impact Assessment was conducted, please provide a copy to OMB.

A Privacy Impact Assessment will be completed if the agency decides after evaluating the pilot and conduction a cost/benefit/ risk analysis, to implement a fully operational ITIPS.

II.C. Government Paperwork Elimination Act (GPEA)

Question II.C.1 -- If this project supports electronic transactions or record keeping that is covered by GPEA, briefly describe the transaction or record keeping functions and how this investment relates to your agency's GPEA plan

QUESTION II.C.2 – WHAT IS THE DATE OF YOUR GPEA PLAN?

Agency GPEA Plan date was August 2000.

Question II.C.3 -- Identify any OMB Paperwork Reduction Act (PRA) control numbers from information collections that are tied to this investment