

**Submission of Comments on the IT Infrastructure Optimization Initiative Line of Business Common Solutions and Business Case Documents**

**Agency: U.S. Nuclear Regulatory Commission**

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**Overall Agency Concurrence:**

Concur:

**Concur with Comment:** Additional information and assessment of resource requirements and costs to NRC need to be assessed prior to concurrence

**Non-Concur:**

| Comment # | Agency POC Last name, First name | Phone #      | Part (I or IV) | Section | Question | Table | Page | COMMENTS  |
|-----------|----------------------------------|--------------|----------------|---------|----------|-------|------|---|
| 1         | Paradiso, Karen (Reiter, Stuart) | 301-415-5852 |                | 3       |          |       | 8    | Three approaches to meet the IOI LoB goals are identified: 1. Identifying Common Solutions, 2. Rigorously measuring results in a consistent, comparable manner across agencies and time, and 3. Establishing a governance model based upon a robust Program Performance Measurement Office (PPMO) in GSA....Each approach has merit however there are alternatives that are worth consideration that: 1. Take advantage of programs already in place and 2. Leverage an agency's management discretion in making budgetary decisions to most effectively achieve the agency's goals.  |
|           | Paradiso, Karen (Reiter, Stuart) | 301-415-5852 |                |         |          |       |      | Identifying Common Solutions - Aggregating demand and focusing on the identification, and communications of best practices offers both cost and performance improvement opportunities. The SMARTBuy program has put in place an infrastructure to achieve efficiencies in software acquisitions. It would seem advantageous to extend the SMARTBuy infrastructure to cover infrastructure commodity acquisitions as opposed to including this objective in the proposed Program Performance Measurement Office (PPMO). The CIO Council has a sub-group that focuses on identifying and communicating "BEST PRACTICES". Consideration should be given to modeling the best practices effort after the program established for Enterprise Architecture, i.e. OMB providing support for what appears to be a "self governing" FEA program. To the extent possible, advantage should be taken of existing infrastructures in pursuing new opportunities.  |
|           | Paradiso, Karen (Reiter, Stuart) | 301-415-5852 |                |         |          |       |      | Achieving Cost Efficiencies and Service Level Standards: The proposed solution recognizes that each agency needs to make trade-offs of cost and quality consistent with mission and budgetary needs. With regard to "service levels", requirements vary agency by agency and within agencies as well. In establishing service levels for any given environment consideration must be given to funding requirements and alternative competing uses for required funds. As such, service level targets should be viewed as agency specific issues. Achieving "best practice" in providing infrastructure services is an important efficiency goal for any agency. However, while cost reductions in providing infrastructure services is an important goal for every agency, the rate at which progress can be made cannot be dictated by a third party, but must be supportive of the agency's achievement of its mission and goals. Resource requirements and resource availability are important variables to be considered. |
|           |                                  |              |                |         |          |       |      | Agencies are best served when they establish their own service level goals, and then an agency can be measured by its management in achievement of its goals. As such, establishing standards for service levels are not congruent with an agency's need to make tradeoffs of cost and quality consistent with mission and budgetary needs. Agencies are best served by setting service levels supportive of their mission objectives and achieving cost efficiencies consistent with mission and budgetary constraints.  |
| 2         | Paradiso, Karen                  | 301-415-5852 |                | 2.5     |          |       | 7    | NRC currently utilizes a Seat Management contract under GSA's Seat Management contract. The NRC's current contract provides for a 3 year refresh cycle that supports agency business needs.   |

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| 3         | Paradiso, Karen                  | 301-415-5852 |                | 3               |          |          | 9    | Common solutions should not be considered "one size fits all". Solutions need to fit all shapes and sizes to support the mission of each department/agency. Specialized requirements will need to be considered. In addition, the PPMO will need to assess performance and how each agency is meeting performance goals based on the utilization of the "common solutions".   |
| 4         | Paradiso, Karen                  | 301-415-5852 |                | 4.2             |          |          | 15   | NRC has been unable to utilize SmartBuy due to the limited availability of software products and existing NRC support contracts that currently provide required software. Expansion of SmartBuy or implementation of a similar vehicle to include infrastructure solutions that can be "sized" appropriately for departments/agencies would be beneficial.                    |
| 5         | Paradiso, Karen                  | 301-415-5852 |                | 4.2.2           |          | Figure 6 | 17   | Gartner models and best practices can be costly to implement and maintain, especially for small departments/agencies.   |
| 6         | Paradiso, Karen                  | 301-415-5852 |                | 4.4             |          |          | 20   | Certification and Accreditation documentation that can be consolidated and provided for "common solutions" would be beneficial.   |
| 7         | Paradiso, Karen                  | 301-415-5852 |                | 4.4             |          |          | 19   | Determining benefits from improved performance really depend on how performance is measured and developing appropriate and specific measures that can really measure the performance. If careful attention to development of performance measures is not performed, benefits will be hard to determine. Iterative refinement of measures will be needed on a continual basis. |
| 8         | Paradiso, Karen                  | 301-415-5852 |                | 4.5             |          |          | 22   | Performance measurement will be begin after implementation of common infrastructure solutions? Each agency will incur costs to "get to" the starting point for a measurable infrastructure. Measures should be developed and implemented by each department/agency.   |
| 9         | Paradiso, Karen                  | 301-415-5852 |                | 4.5.3.1         |          |          | 24   | For availability service levels it is important to determine and agree upon the definition of "availability" and determine what is being measured, how it is being measured and how to calculate the measurement. Differences in the "what" and "how" can lead to very different results as far as percentages for availability.  |
| 10        | Paradiso, Karen                  | 301-415-5852 |                | 4.5.3.2         |          |          | 27   | Performance measurement will be begin after implementation of common infrastructure solutions? Each agency will incur costs to "get to" the starting point for a measurable infrastructure. Measures should be developed and implemented by each department/  |
| 11        | Paradiso, Karen                  | 301-415-5852 |                | 5               |          |          | 35   | Measuring services, for example Data Center services - we need to make sure we are comparing "apples to apples" based on size, mission, FIPS 199 Level (high, moderate, low), etc.  |
| 12        | Paradiso, Karen                  | 301-415-5852 |                | General comment |          |          |      | While the overall initiative at a high level as described sounds good, more detailed analysis at the department/agency level is required to determine cost and benefit. To get to actual implementation at the department/agency level will take resources (money and people). Determining resource requirements would require more details to be provided.                   |
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| 14        |                                  |              |                |                 |          |          |      |   |
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