

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

Agency U. S. Nuclear Regulatory Commission

Bureau N/A

Account Title Salaries and Expenses

Account Identification Code 31-0200-0-1-276

Program Activity Infrastructure

Name of Project New Property and Supply System

Unique Project Identifier: 429-00-02-06-01-1026-00

(IT only)(See section 53)

Project Initiation Date 09/15/02

Project Planned Completion Date 04/15/03

This Project is: Initial Concept \_\_\_\_\_ Planning X Full Acquisition \_\_\_\_\_ Steady State \_\_\_\_\_  
Mixed Life Cycle \_\_\_\_\_

Project/useful segment is funded:

Incrementally \_\_\_\_\_ Fully X

Was this project approved by OMB for previous Year Budget Cycle?

Yes X No \_\_\_\_\_

Did the Executive/Investment Review Committee approve funding for this project this year?

Yes X No \_\_\_\_\_

Did the CFO review the cost goal?

Yes X No \_\_\_\_\_

Did the Procurement Executive review the acquisition strategy?

Yes X No \_\_\_\_\_

Is this investment included in your agency's annual performance plan or multiple agency annual performance plans?

Yes X No \_\_\_\_\_

Does the project support homeland security goals and objectives, i.e., 1) improve border and transportation security, 2) combat bio-terrorism, 3) enhance first responder programs; 4) improve information sharing to decrease response times for actions and improve the quality of decision making?

Yes \_\_\_\_\_ No X

Is this project information technology? (See section 300.4 for definition)

Yes X No \_\_\_\_\_

For information technology projects only:

a. Is this Project a Financial Management System? (see section 53.3 for a definition)

Yes \_\_\_\_\_ No X

If so, does this project address a FFMIA compliance area?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, which compliance area?

b. Does this project implement electronic transactions or record keeping that is covered by the Government Paperwork Elimination Act (GPEA)?

Yes \_\_\_\_\_ No X

If so, is it included in your GPEA plan (and does not yet provide an electronic option)?

Yes \_\_\_\_\_ No \_\_\_\_\_

Does the project already provide an electronic option?

Yes \_\_\_\_\_ No \_\_\_\_\_

c. Was a privacy impact assessment performed for this project?

Yes X No \_\_\_\_\_

d. Was this project reviewed as part of the FY 2002 Government Information Security Reform Act review process?

Yes X No \_\_\_\_\_Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions 5

FOIA- 2003-241

A12

- d.1 If yes, were any weaknesses found? Yes X (with old system) No
- d.2. Have the weaknesses been incorporated into the agency's corrective action plans? Yes X No
- e. Has this project been identified as a national critical operation or asset by a Project Matrix review or other agency determination? Yes     No X
- e.1 If no, is this an agency mission critical or essential service, system, operation, or asset (such as those documented in the agency's COOP Plan), other than those identified above as national critical infrastructures? Yes     No X

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### SUMMARY OF SPENDING FOR PROJECT STAGES

(In Millions)

(Estimates for BY+1 and beyond are for planning purposes only and do not represent budget decisions)

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	PY-1 and PY Earlier	PY 2002	CY 2003	BY 2004
<hr/>				
Planning:				
Budgetary Resources	\$0.000	\$0.000	\$0.000	\$0.000
Outlays	\$0.000	\$0.000	\$0.000	\$0.000
Acquisition :				
Budgetary Resources	\$0.000	\$0.207*	\$0.000	\$0.000
Outlays	\$0.000	\$0.000	\$0.207*	\$0.000
Total, sum of stages:				
Budgetary Resources	\$0.000	\$0.207*	\$0.000	\$0.000
Outlays	\$0.000	\$0.000	\$0.207*	\$0.000
Maintenance:				
Budgetary Resources	\$0.000	\$0.000	\$0.125**	\$0.132**
Outlays	\$0.000	\$0.000	\$0.000	\$0.000
Total, All Stages:				
Budgetary Resources	\$0.000	\$0.207*	\$0.125**	\$0.132**
Outlays	\$0.000	\$0.000	\$0.207*	\$0.000

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**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.

This is the initial Exhibit 300 for the new Property and Supply System (PASS), which is in the planning (select) phase. PASS is a replacement system for the current outdated property and supply system. The new PASS is envisioned to provide NRC with more user-friendly screens, the ability to tailor forms and reports for approximately 100 users, and reduce the time needed to administer the system. Archibus is the COTS

software of choice, but the Business Case has not completed the final concurrence chain of the Office of the Chief Information Officer (OCIO). Archibus is expected to require minimal, if any, customization, greater flexibility and ease of use, and provide robust access to interface logic. The Space Planning System (SPS), owned by the Office of Administration, already uses many of the Archibus modules for the NRC's space planning needs. The new PASS will be able to share the employee/contractor and building information that is already stored in the database if the Business Case is approved.

The new PASS is in the initial planning (select) phase and will need to be in place for the full NRC inventory to take place in May of 2003. The current PASS does not have a current maintenance contract because the current vendor has chosen to no longer support the older DOS-based software. The PASS may become unstable or unusable with the new operating system software planned for the NRC infrastructure in the Spring of 2003. The current PASS can no longer be programmed to meet the changing needs of the NRC. The NRC management has stated that all items must be inventoried in Fiscal Year 2003. The current PASS will only allow for items over \$300 to be selected for the inventory. The new PASS will provide flexibility so that these types of problems will no longer occur.

The Information Technology (IT) Screening Form, the Business Case and the Cost Benefits Analysis have been completed by the Office of Administration. The new PASS has undergone a series of reviews and the final Business Case is in the final process of approval. After the Business Case has been approved, the Statement of Work will be sent to the Navy (Archibus will be acquired via Interagency Agreement) to be approved and then forwarded on the contractor.

**2. What assumptions are made about this project and why?**

- Use current infrastructure and operating system
- Future enhancements in the requirements document will have minimal impact on our system
- Specifics of the output file for the HelpDesk software will be defined by the contractor HelpDesk staff
- Backups will be managed by current infrastructure
- Anticipate no impact on current infrastructure.

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

The Office of Administration (ADM) established a market research team/working group consisting of representatives from OCIO, Regions, RES, CFO and ADM, who participated in market research activities to identify various alternatives to replacing the current system. The team attended demonstrations of three different property management systems. The group also contacted many agencies to study what they were using for a property system. The NRC has specific needs that were not fully met by any of these studied systems. Archibus, a COTS package, came out the best for the NRC's needs. The Space Planning System (SPS) already uses many of the Archibus modules for the NRC's space planning needs. The new PASS will be able to share the employee/contractor and building information that is already stored in the database.

**I.B. Justification (All Assets)****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?
1. 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: 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 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 non-proliferation			■
NRC Corporate Management Strategy 1: Employ innovative and sound business practices	Ensure innovative and sound business practices	X	<ul style="list-style-type: none"> <li>■ Provide new and better ways of doing business to increase efficiency of operations</li> <li>■ Provide proactive information and information technology services</li> </ul>
NRC Corporate Management Strategy 2: Sustain a high-performing, diverse workforce.			■
NRC Corporate Management Strategy 3: Provide proactive information management and information technology services.	Ensure productive and proactive information management and information technology services	X	<ul style="list-style-type: none"> <li>■ Provide new system to improve information technology services</li> </ul>
NRC Corporate Management Strategy 4: Communicate strategic change.			■

2. How does it support the strategic goals from the President's Management Agenda?

Presidents Management Agenda (PMA)	Supports	How Does Your Initiative Support This PMA Item?
Human Capital		
Competitive Sourcing		
Financial Performance	X	Provides improved financial performance because the new PASS will better track asset management and supplies
E-Government		
Budget and Performance Integration		

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

Alternative 1 is to upgrade the current system with the 2.1 version through the current vendor, KPMG Peat Marwick. There is no new equipment required; software is free, but customization is required, which includes the redesign of the supply module. The customization is very extensive and no longer makes the software a COTS product.

Alternative 2 is use of DHHS' SunFlower web-based system. This option would require a monthly fee and require a separately developed supply inventory module. This system also does not provide desirable custodial transfer and service transaction features.

Alternative 3 is to use ARCHIBUS that is already in place with the agency's Space Planning System in ADM's Division of Facilities and Security. For ARCHIBUS, ADM would acquire the necessary additional user licenses, data conversion and other necessary technical support services using the Navy CAD II contract. ADM would fund the effort for data conversion from the current property and supply system to the proposed module as well as having new user-friendly screens added to aid the Property Custodians and supply personnel. ADM has already purchased a new server for its space planning needs and this will also accommodate our property and supply needs.

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

ADM selected alternative number 3 that is a commercial off-the-shelf (COTS) software package.

5. Who are the customers for this project?

The main customers for the new PASS are the Administrative Services Center (ASC), ADM managers and the NRC Property Custodians.

6. Who are the stakeholders of this project?

The stakeholders for this project are approximately 100 NRC property custodians and the IT coordinators in the offices who will have access to the property records. Primary users of the new system will be Headquarters Property Custodians, Regional Property Custodians, and ADM property staff. Additional users will be given access as the need arises. The public will not have access to the system. ADM established a market research team/working group consisting of representatives from OCIO, Regions, RES, CFO and ADM, who participated in market research activities to identify various alternatives to replacing the current system. The team attended demonstrations of three different property management systems. ADM will

sponsor and provide project management over the system. Property custodians and other stakeholders will be users of the system. We will need OCIO assistance in setting up access for users.

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

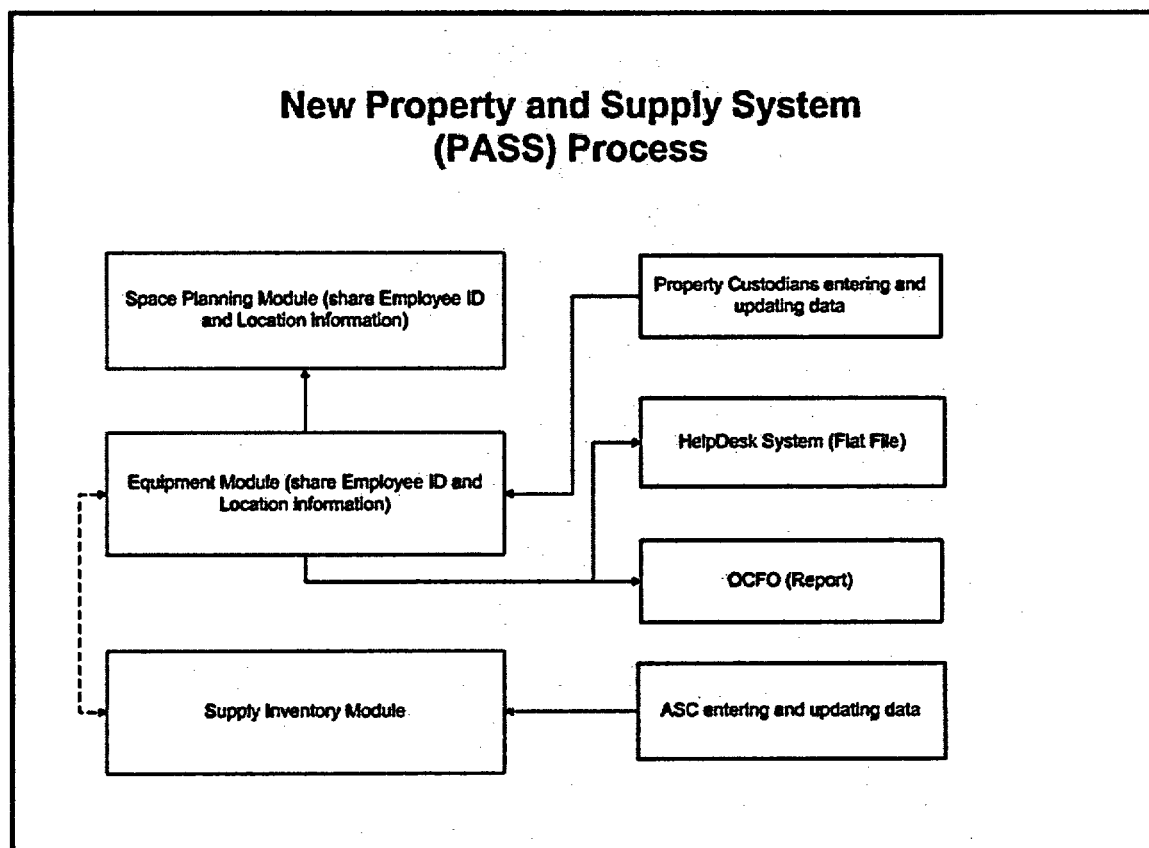
PASS is not a multi-agency initiative.

**8. How will this investment reduce costs or improve efficiencies?**

The new PASS will reduce costs and improve efficiencies by allowing for better control of the data. The Property Custodians and Property Specialists will be able to greatly shorten the time it currently takes to run reports, perform manual calculations, input data, correct data and transfer data. The new PASS will use the Archibus COTS package and modifications will be handled through specialized schemas within the system. Any upgrades to the COTS software will not affect the modified schemas and will therefore save money overall. The old version of PASS is no longer supported by the original vendor. The old PASS could not be upgraded without reprogramming the entire supply portion and much of the property portion. For any major or minor improvement to the current system, this cost would need to be repeated due to the special NRC customization to the software. The new PASS will solve this problem and keep costs of upgrades down.

The old PASS does not share data with other systems. The new PASS allows for easy data import and export. The data will be more manageable with the new system as well and reporting will be greatly improved.

**9. List all other assets that interface with this asset - Space Planning System and the Supply System. The HelpDesk system and the OCFO will receive updates but will not be direct interfaces (see graphic below). Have these assets been reenigneered as part of this project? Yes X, No \_\_\_\_.**



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

<b>Fiscal Year</b>	<b>Strategic Goal(s) Supported</b>	<b>Existing Baseline</b>	<b>Planned Performance Improvement Goal</b>	<b>Actual Performance Improvement Results</b>	<b>Planned Performance Metric</b>	<b>Actual Performance Metric Results</b>
2002	Accurately track the NRC's assets and process and track supply requests. This will assist the NRC in its financial management.	System Administrator spends approximately 8 hours per month manually updating the "Date Table". System will not accept transactions if current date is not in the table. Table requires current date, prior date, next effective date, fiscal month and fiscal year before a transaction can be entered.	Reduce system administrator hours to zero for updating the date table	System in planning/select phase	No input required. Dates will work automatically.	System in planning/select phase
2002	Accurately track the NRC's assets and process and track supply requests. This will assist the NRC in its financial management.	Canned reports with no view or sorting options. Property Custodians spend approximately 2-4 hours per month generating adhoc reports using Crystal Reports.	Reduce the hours needed to produce system reports	System in planning/select phase	Capability to view, sort, and produce adhoc reports from within system  Allow report export to other databases	System in planning/select phase
2002	Accurately track the NRC's assets and process and track supply requests. This will assist the NRC in its financial	Perform manual calculations because depreciation does not work	Allow automatic depreciation	System in planning/select phase	Capability to depreciate one asset or entire database.	System in planning/select phase

	management.	does not work correctly				
2002	Accurately track the NRC's assets and process and track supply requests. This will assist the NRC in its financial management.	Regional offices spend approximately 20 hrs/week entering inventory updates manually.	Create automatic inventory updating for Regions	System in planning/select phase	Will allow regions to use bar code scanners. Updates will be automatic	System in planning/select phase
2003						
2004						
2005						
2006						
2007						

**I.D. Program Management [All Assets]**

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

Sharon Boone/Property Specialist/301415-2332

Yes X No       

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

Myron Kemerer/Senior Computer Specialist (Acquisitions)/301-415-8735  
(contract administrator for the NavyCAD II contract)

Yes X No       

3. Is there an Integrated Project Team?

Yes X No       

- 3.A. If so, list the skill set represented.

Not finalized yet – still waiting on Business Case approval

Elois Wiggins/Contracting Officer/301-415-7317

Sharon Boone/Property Specialist/301-415-2332

Karen Cudd/IT Coordinator/301-415-6554

Mary Roos/IT Coordinator/301-415-6598

Stuart Lynn/Senior Systems Analyst/301-415-6610

Tom Kellam/Property Custodian/301-415-7429

Debra Robinson/Property Custodian/301-415-6740

Manon Butt/Property Custodian/301-415-6222

4. Is there a sponsor/owner?

Michael L. Springer/Office Director, Office of Administration/301-415-6222

Yes X No       

**Part II: Additional Business Case Criteria for Information Technology****II. A. Enterprise Architecture****II.A.1 Business**

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

Yes, the old PASS (in steady state) has been identified in NRC's in-progress enterprise architecture (EA).



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

This old PASS (in steady state) falls within the scope of NRC's baseline EA. As such, this system supports the performance of the business functions identified in the agency enterprise business model, documented in the NRC publication, "NRC Enterprise Model," provides the data required by NRC's internal operations/infrastructure (intra-agency) administration business function, and utilizes products and components that are aligned with NRC's current application and technology standards and future direction as specified in NRC's existing technology planning documents. Although the NRC's existing technology planning documents are being updated, the current documents identify some core technology needs. These core technology needs are in the process of being updated and expanded through an evolving organizational EA governance process that will ensure that all current and future technology needs are vetted by NRC business managers to validate links to NRC business drivers for the identified technologies. When fully functional, NRC's integrated EA and CPIC processes will enable NRC to apply the same sound risk management strategies to its IT investments that have long characterized NRC's core business operations. NRC has also provided the Federal Enterprise Business Reference Model (FEBRM) with high level business functions and subfunctions derived from the NRC Enterprise Model. NRC is working to uncover additional internal cross-cutting initiatives and has begun to look at other-agency business processes and State business processes to identify potential areas for collaborative efforts.

Over the past years, NRC has developed various architectural components of an EA. These components were delineated and enclosed in a letter from NRC provided to Bill McVay during the FY 2003 budget process. Taken together, these items include all components of an EA. However, the NRC has recently chosen to rely on the principles and practices of EA presented in the Federal CIO Council's "Federal Enterprise Architecture Framework," FEAF, to revitalize its EA program, fully integrate and align the EA with the CPIC process, update all existing EA artifacts, support sound project and change management utilizing the System Development and Life-Cycle Management (SDLCM) Methodology, and identify and foster understanding of how existing and future information technology can better support current and future NRC business activities and operations. The NRC has recently staffed an agency EA position to energize the program and is beginning to take the steps necessary to ensure agency-wide utilization of its EA. For example, NRC is currently working on EA strategy and planning documents that will ensure a sustained and fully integrated EA process and avoid the start-stop-resume cycle that has been a problem in past NRC EA endeavors. The NRC is now in the process of identifying the updates necessary to NRC Management Directive 2.1, "Information Technology Architecture," and NRC Management Directive 2.2, "Capital Planning and Investment Control," to fully integrate all needed changes in NRC's management processes. Purposeful business thinking, systematic technical analysis, careful political orchestration, change management and communication and outreach will underlay all future NRC EA efforts. The component-based architectural approach taken from the FEAF will enable the component focus necessary to achieve quick gains while the revamped NRC EA process develops over time and reaches the level of maturity necessary to more effectively address business problems. The FEAF will provide the necessary foundation and support to link business investment and technology.

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

Since the FEA BRM is undergoing continual update, our responses are based upon the latest data that we have available.

FEABRM Lines of Business	FEABRM Sub-Functions Supported
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Administration (Internal Operations/Infrastructure Intra-Agency)	Facilities, Fleet and Equipment Management
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- D. Briefly describe how this initiative supports the identified Lines of Business and Sub-Functions of the Federal Business Architecture.**

The PASS will maintain data records for all NRC equipment, furniture, and supplies thus supporting the FEA BRM internal operations/infrastructure intra-agency administration business function and the facilities, fleet, and equipment management sub-function.

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

Yes, this project has been approved at the planning stage through the NRC EA Review committee.

- F. What are the major process simplification/reengineering/design projects that are required as part of this initiative?**

As this project is in the planning (control) phase, process simplification/reengineering/design projects are yet to be determined.

- G. What are the major organization restructuring, training, and change management projects that are required?**

No major restructuring and change management required because the overall business process will continue like the old PASS. Training for administrators, major users and Property Custodians will be included at the end of the installation of software.

- H. What are the Agency lines of business involved in this project?**

The Agency lines of business that are involved in this project are conducted by the employees who utilize the Property System and the Supply system. These are mostly administrative duties. The primary NRC line of business involved in this project is facilities and property management:

#### **FACILITIES AND PROPERTY MANAGEMENT**

Program Direction  
Facility Operations  
Property Operations

- I. What are the implications for the agency business architecture?**

There will be minimal implications for the agency business architecture. The new PASS will bring about improvements and efficiencies in the current way NRC tracks inventory and supplies. Archibus already resides on an ADM server as the Space Planning System (SPS) and the new PASS modules will be added to that system.

#### **II.A.2 Data**

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

The new PASS will contain employee and contractor names and locations. The PASS will also contain information about NRC property and supplies. This system will not contain sensitive information.

- 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?**

No. The new PASS data is internal to the NRC only and will not be shared outside the agency.

- 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?**

No. The new PASS data is internal to the NRC only and will not be shared outside the agency.

- 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.**

The new PASS will not process spatial data.

### **II.A.3 Application and Technology**

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

Since project inception, the new PASS project staff members have worked to ensure PASS compliance with the EA in its various iterations. The current NRC infrastructure and NRC existing technology planning documents have been given priority consideration and have helped drive the technical requirements of PASS. The PASS project is in compliance with the current application and technology layers of the EA and insofar as EA migration planning has been addressed, PASS project staff will continue to work with OCIO EA to remain in compliance with any migration plan that is developed.

- B. Are all of the hardware, applications, and infrastructure requirements for this project included in the EA Technical Reference Model? If not, please explain.**

To date, the new PASS project will require hardware, applications, and infrastructure already identified in the Technical Reference Model.

**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)?**

Funds have been allocated for security by the Office of Administration for the new PASS. In addition, the OCIO provides funding and support for the security services provided by the underlying LAN general support system (GSS), on which the new PASS will be relying.

The new PASS will be a major application and is currently in the development (control) phase; however, for the majority of the security requirements, it will rely on the security provided by the underlying NRC LAN general support system.

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

\$67,000 has been allocated to security for this project in FY 2004.

**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 new PASS is currently in the development (control) phase and will be certified and accredited, and will be compliant with all security requirements for GISRA, OMB policy, and NIST when the system is finalized.

**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?**

Yes, the Security Plan will be up to date and will be complaint with OMB and NIST guidance when the system is completed. The new PASS is currently in the development (control) phase so the Security Plan has not been written yet. The contractor will complete and test the security plan by August 15, 2003 before the system becomes operational.

**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.**

Certification and accreditation activities will be completed at the project end. NIST approved methodology and processes will be utilized. The new PASS will be at NIST Level 5.

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

Testing of security controls will be completed as part of the certification testing of the system. The new PASS is currently in the development (control) phase.

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

All system users will be appropriately trained during the final phase of the project. This will also be addressed in the Security Plan.

- 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?**

NRC has recently implemented information systems security incident response procedures. These are part of the underlying security services provided by the NRC LAN general support system. The incident response procedures have been reviewed and approved by GSA's FedCIRC, and the NRC is reporting incidents to the GSA 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?"**

The new PASS will be a major application installed at NRC headquarters. For the majority of security requirements, the new system will rely on the security provided by the underlying NRC LAN general support system.

- 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 new PASS. Access controls are addressed through the overall NRC LAN/WAN GSS security infrastructure.

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

This issue will be addressed in the security controls that are designed in the new PASS application and the security services provided by the NRC LAN general support system. The security controls to ensure the system properly handles personal information will be verified during system security certification testing.

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

The new PASS will contain personal information about individuals. A Privacy Impact Assessment is attached to this Exhibit 300.

## **II. C. Government Paperwork Elimination Act (GPEA)**

- 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.**

The new PASS does not support electronic transactions or record-keeping covered by GPEA

- II.C.2 What is the date of your GPEA plan?**

This is not applicable because the new PASS does not support electronic transactions or record-keeping covered by GPEA

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

This is not applicable because the new PASS does not support electronic transactions or record-keeping covered by GPEA