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# United States Senate

COMMITTEE ON  
HOMELAND SECURITY AND GOVERNMENTAL AFFAIRS

WASHINGTON, DC 20510-6250

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April 26, 2016

The Honorable Shaun Donovan  
Director  
Office of Management and Budget  
725 17th Street, NW  
Washington, D.C. 20503

Dear Director Donovan,

We write regarding the Office of Management and Budget's Circular A-130, "Management of Federal Information Resources."<sup>1</sup> Continuous, automated monitoring of cybersecurity controls is a primary component of an organization's cybersecurity program. Indeed, OMB, the Department of Homeland Security (DHS), and the National Institute of Standards and Technology (NIST) have all indicated that continuous monitoring is a top priority.

Circular A-130 remains an obstacle to the full adoption of this modern, automated approach to cybersecurity across government. As you know, Circular A-130 is OMB's primary policy document for information technology and cybersecurity. However, Circular A-130 originated in the 1980s and, despite the ever-changing nature of cyber threats, has not been revised in more than 15 years. Calls for revisions date as far back as 2005.<sup>2</sup> In 2012, a group of experts called for a rewrite of Circular A-130, stating that "absent changes in policy, agency staff and oversight groups (e.g., Inspectors General and the Government Accountability Office) will continue to waste scarce resources on strategies that do little to mitigate risk."<sup>3</sup>

Presently, Circular A-130 Appendix III, "Security of Federal Automated Information Resources," requires an agency to audit the security controls for general support systems and major applications at least every three years and to produce a large volume of paperwork to report the audits.<sup>4</sup> While some documentation of security controls is essential, these three-year assessments are not cost-effective or consistent with best-practices or other federal policies.

To more quickly transition to continuous, automated monitoring, Congress passed the Federal Information Security Modernization Act of 2014.<sup>5</sup> Among other things, the Act requires OMB to update Appendix III of Circular A-130 by December 2015 "to eliminate inefficient or

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<sup>1</sup> Office of Mgmt. & Budget, Exec. Office of the President, Circular A-130.

<sup>2</sup> See "OMB Considers A-130 Rewrite," David Perera, *Federal Computer Weekly*, March 6, 2005.

<sup>3</sup> See "Updating U.S. Federal Cybersecurity Policy and Guidance," Center for Strategic and International Studies, page 1, October 2012.

<sup>4</sup> Office of Mgmt. & Budget, Exec. Office of the President, Circular A-130, Appendix III (A)(3)(a), (A)(3)(b).

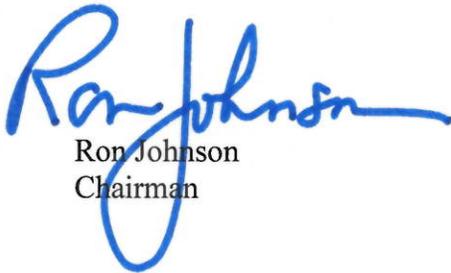
<sup>5</sup> Federal Information Security Modernization Act of 2014, Pub. L. No. 113-283, 128 Stat. 3087.

wasteful reporting.”<sup>6</sup> It also requires OMB to “provide quarterly briefings to Congress on the status of the amendment or revision.”<sup>7</sup>

According to the most recent FISMA annual report, OMB is currently in the process of significantly revising Circular A-130 and has asked for public comment on the proposed revisions. We appreciate OMB’s work to update Circular A-130, but also emphasize the importance of completing this revision in a timely manner. We request that you provide us with a date by which you plan to issue revisions to Circular A-130, and that OMB briefs our staffs on the status of the update within 30 days of this letter and quarterly thereafter until its completion.

Thank you for your attention to this important matter. We look forward to your response.

Sincerely,



Ron Johnson  
Chairman



Thomas R. Carper  
Ranking Member

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<sup>6</sup> *Id.* § 2(f)(1).

<sup>7</sup> *Id.*