

Status on the Interconnect Security Agreement

ISAC Meeting

Nov 14-15

Background

- Federal policy requires federal agencies to establish interconnection agreements
 - OMB Circular A-130 Appendix III
- A system interconnection is the direct connection of two or more IT systems for the purpose of sharing data
- Major issue for IHS has been the interpretation of FISMA requirements and applicability to tribal and urban sites

FISMA Interpretation

- Once a site has been contracted or compacted, the tribe owns the data and the data is no longer federal
- Tribes and Urban sites are not operating on behalf of the federal government for purposes of meeting FISMA requirements
- As a result, C&A requirements do not apply to tribal and urban sites

ISA Policy Status

- ISA Policy will be posted as Indian Health Manual, Part 8, Chapter 15
 - Document is ready to be issued for national review and comment
- Tribal Leader letter (containing the draft ISA policy as an attachment) is currently undergoing headquarters review
- Document should be distributed for review and comment within the next 2-3 weeks

ISA Policy Implementation

- ISAs must be implemented within 12 months of the effective date of the ISA policy
- Implementation will consist of a MOU and ISA per NIST guidance (NIST 800-47)
- On-line policy will contain links to MOU and ISA templates
- Vendor ISAs will continue to use the template currently available on the OIT Security website