Comments on Department's Memorandum of Understanding

The Department sent an MOU to FSA for an interconnection between the Department and FSA. The FSA Security and Privacy Team reviewed the MOU and had a few comments, which are described below.

- Section 7.2 Security Incidents, last sentence, "The corresponding system owner will receive formal notification including a root cause analysis in writing within 5 business days after detection of the incident." We've been working with Ed on the new Incident Response guidance and it seems like with some of the reporting requirements, it may take more than 5 days to determine the root cause of the of the incident. A suggestion for change would be to remove the "including a root cause analysis" from the sentence.
- Section 13.0 Timeline. It states that the agreement will automatically be renewed at the end of the first year. In NIST 800-47, it says that the agreement will automatically expire at the end of the first year. Possible change?
- In a previous email, it was mentioned that there was a template for the MOU. Is this true and could a copy be sent to FSA? Is the OCIO template used in association with the VDC MOU the official Department template that should also be used for FSA MOUs?
- Also, the VDC MOU mentions an associated ISA. Could the FSA receive a copy of that ISA? Also, was that ISA created with an OCIO template? If so, is it considered the official Dept ISA template that FSA must use?