The Honorable Gerry Connolly
Chairman
Government Operations Subcommittee
2238 Rayburn House Office Building
Washington, DC 20515

The Honorable Mark Meadows
Ranking Member
Government Operations Subcommittee
2160 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Connolly and Ranking Member Meadows:

On behalf of Infor and its 5,600 employees in the United States and 16,000 across the globe, I would like to thank you for the opportunity to comment on the FedRAMP Authorization Act, H.R. 3941. This is a critical piece of legislation that will drive innovation and modernization as governments throughout the nation transition to the cloud.

Infor is a global leader in business cloud software products for companies in industry specific markets and governments at all levels. In bringing its suites of tools and commercial best practices to the U.S. Government, Infor has invested in FedRAMP certification for over 18 web-based software-as-a-service (SaaS) applications on the Infor Operating Service Platform. This platform is comprised of integrated cloud suites that support workloads for disciplines including Asset & Maintenance Management, Human Capital Management, Financial & Supply Management and Manufacturing. It provides cloud computing architecture, open source software and in-memory computing technology, delivering high performance, support for open standards, enhanced productivity, responsive design, and mobile access via a wide range of devices. This significant investment and ongoing commitment to FedRAMP security protocols affords Infor a unique perspective to the importance of strengthening the program and the positive impact this legislation would have on the success of the program and its objectives.

Public sector migration to cloud-based IT serves a variety of government objectives, including greater efficiency, transparency and delivery of services. The President's Management Agenda (PMA) states that it is the objective of Federal agencies to enhance mission effectiveness by improving the quality and efficiency of critical citizen-facing services, including through the increased utilization of cloud-based solutions.

FedRAMP has established itself as the common standard for cloud security assessment, authorization, and continuous monitoring across the United States government, and increasingly for state and local agencies. It's a tough, rigorous process, and necessarily so, given the range and severity of cybersecurity threats confronting governments and industry every day.

Perhaps the greatest business benefit for FedRAMP Cloud Migration is the requirement to develop and follow clear processes, applying standardized metrics, and ensuring that appropriate mitigation strategies are in place. Ensuring that duties and responsibilities are assigned in case of a breach or loss of service, and protocols are in place for recovery and response, improves public and executive confidence in IT system security. Further, FedRAMP protocols:

- provide a baseline standard for consistent security authorizations;
- ensures a rigorous application of IT security practices;
- provides continuous monitoring through increased automation and near real-time data; and
- delivers on all the operational efficiencies and productivity improvements that make cloud computing a breakthrough opportunity for front-line program managers and staff.

Complying with FedRAMP during a cloud transition offers clear business benefits to agencies of all sizes, no matter where in the migration process the agency is today. FedRAMP enables agencies to accelerate their mission, speeds up cloud migration, and placed government IT systems into a continuously monitored and upgraded ecosystem. Further, while the simple title "Federal Risk and Authorization Management Program (FedRAMP)" implies Federal government, the FedRAMP platform is available for any organization who is interested in top-notch security and privacy, including State government and municipalities.

The FedRAMP Authorization Act has four key elements that Infor believes would significantly improve the program: Codification, Appropriations, Automation, and Transferability.

Codifying FedRAMP into federal statute will ensure the long-term viability of the program and addresses the uncertainty within the private sector and the agencies that need to adopt it. With a greater level of certainty and consistency, high-tech companies like Infor are more likely to invest in the tools that will bring the innovative solutions and commercial best practices to modernize governments.

H.R. 3941 proposes an annual funding level of $25M for the FedRAMP Program Management Office and the Joint Authorization Board. These essential funds will increase the capacity and efficiency of both offices – streamlining processes, reducing overall costs of the authorization process, and ensuring greater levels of transparency and accountability for the program.
The legislation requires the FedRAMP PMO to identify automated solutions that can streamline the issuance of provisional authorizations to operate and to provide a means for automating security assessments and reviews. Automating the certification and renewal process significantly reduces the time and financial investment needed for commercial companies to participate in the program and makes the overall process more efficient and effective for agencies.
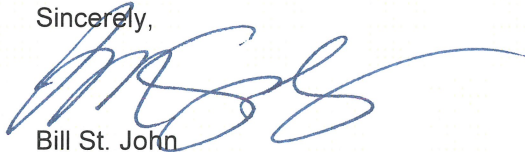Finally, H.R. 3941 requires that agency heads provide give cloud computing products and services that are either given a provisional authorization to operate by the Joint Authorization Board or have been FedRAMP authorized a "presumption of adequacy" for that agency's use. This greater level of reciprocity reduced the burden on agencies to review and authorize "authorization to operate" and provides greater access to innovative cloud solutions. Some agencies are already recognizing the significant benefit of this "transferability," which gives agencies broader access to new technologies. In August, DoD announced that it would authorize data designated publicly releasable (IL2), to be stored in the cloud on authorized FedRAMP offerings without waiting for DOD to issue a specific authorization.
As a provider of over 18 FedRAMP certified solutions and as a Public Sector vendor committed to the success and security of the program, Infor strongly supports the FedRAMP Authorization Act.

Thank you for considering our comments on this crucial piece of legislation. We look forward to the opportunity to meet with you and your staff to follow-up on these comments and discuss how we can be helpful in driving passage of the legislation.

Sincerely,

Bill St. John
VP & GM North America Public Sector