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Burden Statement

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DRR IT Security Clause Outreach Survey

1. How has the restriction on off-shoring of FDIC data [Contract Clause 7.4.2-2(b), Off-site Processing and Storing of FDIC Information, Control of Information] prompted a change in the way you manage data for the solution you provide to the FDIC?
2. How does the above restriction compare with your other contracts? Please specify whether the contracts are with government (public) or non-government (private) agencies/companies.
3. What (if any) staffing challenges have you encountered due to the requirements that only US Citizens may work under contract position designations or functions determined to have a high risk rating by the FDIC? [Contract Clause 7.5.2-8(c), Risk Level Designation (Functional Responsibility) or 7.5.2-10, Risk Level Designation (Labor Category)
4. How do FDIC requirements for data retention and destruction at the end of the contract affect the solution that you deliver to the FDIC? [Contract Clause 7.6.3-2(c.1), Contractor Return, Destruction and Retention of FDIC Information]
5. Are the requirements of Contract Clause 7.6.3-2(c.1), [Contractor Return, Destruction and Retention of FDIC Information] substantially different than those for your other customers?
6. Given the Federal Government's evolving adoption for NIST Special Publication Standards, (http://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-171r1.pdf) how would implementation by the FDIC of requiring a NIST SP 800-171 assessment for outsourced information systems affect your current work with the FDIC?
7. Has your company undergone a NIST 800-171 based assessment, or created a System Security Plan using the NIST controls?
8. Have you or are you planning on creating a NIST 171 System Security Plan and having it 3rd party verified?
9. Have you commissioned an independent third party penetration test?
10. Do you have any industry best practice or other recommendations for assessing the cybersecurity of service providers?
11. What level of monitoring by the FDIC do you believe would be adequate to ensure that outsourced service providers maintain appropriate security controls and why?
12. How would adoption of the NIST System Security Plan requirements and existing outsourcing and staffing requirements mentioned above and mandated by the FDIC affect your response to future solicitations from the FDIC?