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Transitioning from the Urgent Capability Acquisition Pathway to another Pathway Program of Record

Department of Defense
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The content on this page is implementation guidance and best practices describing the policy found in DoD Instruction (DoDI) 8510.01 (reference (a)). Policy requirements are cited where appropriate. DoD Components may implement Risk Management Framework (RMF) requirements in a manner they choose consistent with DoDI 8510.01 and Executive Order 13800 (reference (b)).

This page was developed in collaboration with the RMF Technical Advisory Group (TAG) community, the Services, the Office of the Under Secretary of Defense for Acquisition and Sustainment, and the Office of the Under Secretary of Defense for Research and Engineering. For more information regarding policy and best practices, please contact the RMF TAG Secretariat (NIPR e-mail: OSD.RMFTAG-Secretariat@mail.mil).

There may be times when a system developed in the Urgent Capability Acquisition (UCA) Pathway is successful and the appropriate authorities decide to equip general forces with the system beyond a specific contingency operation. In this case, the appropriate Component Head and Component Acquisition Executive may transition the system to another Pathway. Regardless of which Pathway a UCA system or part of a system transitions to, the following information applies.

RMF teams and program management offices (PMOs) will need to review any RMF tailoring done for the system developed in the UCA Pathway to determine if this tailoring is still appropriate in the new Pathway. Likewise, any residual risks from noncompliant controls or unresolved deficiencies need to be resolved or appropriately mitigated. As such, RMF and PMO teams may reuse existing artifacts and hone their risk management and system development focus to previously mitigated high and critical findings and unresolved deficiencies from the UCA Pathway.

Switching Pathways means RMF artifacts already exist for the system in question. Some of these artifacts will need renewed attention (e.g., Security Assessment Report, Risk Assessment Report, Plan of Action and Milestones) given the Pathway shifts and prolonged lifespan. As the UCA Pathway already established the minimum standards needed to operate a system for a limited tenure, the new Pathway can then prioritize the residual risks left unresolved and further mitigate any risks.

Once RMF teams and PMOs have completed and updated the necessary artifacts for the new Pathway, the system's refreshed security authorization package will need a new system authorization only if the system's Authorizing Official has changed; otherwise, a new authorization is only needed consistent with the system's current authorization determination timeline. In the case of a MTA Pathway system, consistent with MTA policy, even systems with minimal development and maximum reuse of artifacts, will require a new authorization decision.

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References

- (a) DoDI 8510.01, "RMF for DoD Systems, July 19, 2022
<https://www.esd.whs.mil/Portals/54/Documents/DD/issuances/dodi/851001p.pdf?ver=5YnACrAlUCPZ_qeq4T5nlg%3d%3d>
- (b) Executive Order 13800, "Strengthening the Cybersecurity of Federal Networks and Critical Infrastructure," May 16, 2017
<<https://www.federalregister.gov/documents/2017/05/16/2017-10004/strengthening-the-cybersecurity-of-federal-networks-and-critical-infrastructure>>