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13 August 2009

Ms. Mary Haldane
Federal Student Aid
U.S. Department of Education
(Union Center Plaza, Room 102E1)
400 Maryland Avenue SW
Washington DC 20202

Subject: 2009 Software Developers Conference, Questions and Answers

The December 2008 FERPA Regulations, the August 2009 NIST Special Document 800-53 and the December 2008 Draft 800-63 provide guidance and direction on security practices. These are, in turn, dependent upon the levels of risk and assurance. For guidance of registrars and financial aid administrators, can you tell us the required level of assurance for a student's financial aid data, or tell us who in the Department of Education or Office of Management and Budget to whom a request for this information should be made?

It appears that three real-time data transport networks will be implemented in the next calendar year. These include the exchange of transcripts and other student academic records between K-12 states agencies, districts and schools and institutions of higher education (SIFA and PESC), a possible update of the Meteor network, and the implemented exchange of academic records between universities in the 46 nation European Higher Education Area and U.S. colleges and universities (the Bologna process). Although message content would be different, several community leaders would like the same data transport specifications (profiles in the OASIS sense) be used for all of these exchanges. To provide guidance to these organizations, it would be helpful to know about FSA plans. The purpose of these questions is to identify planned decisions to *not use* certain technologies which may be already rejected by FSA as contrasted to asking which technologies likely would be selected in the future.

We are following Federal Enterprise Architecture initiative as well through CIO Council, NIST, and OMB publications and presentations to be aware of future incompatibilities.

In response to an informal question and answer at the 2008 Software Developers Conference, an FSA representative said it would be likely to use SOAP if real-time message exchanges were implemented. (According to current plans the three systems listed use SOAP in their pilot or production systems). Is this informal assessment still valid?

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Are there any plans that would preclude the use of WS-Addressing and WS-Security specifications? The encryption of messages using PKI technology to meet NIST requirements?

When implementing the transition to COD, FSA used IBM's MQ technology as an enterprise message bus. Does FSA continue to use MQ technology and are there any plans to discontinue its use? The purpose of this question is to understand the general technology being used. FSA also had the capability to do format conversations using MQ technology. Does FSA continue to support the capability for conversion between data format whether or not it is currently used? (Data conversions are being considered by the international network for different message content, likely using XSLT).

U.S. colleges and universities are joining the InCommon federation. If so and when in the planning process will FSA consider federated authentication and federated authorization and "transitive trust"? Would FSA consider a review of InCommon to see if its policies and practices are acceptable to FSA?

Because of conflicting schedules I will be unable to attend this year's Conference. I have asked Tim Bornholtz to take notes for me. Since he has been involved in several of these networks, he may be able to respond to any ambiguity of my questions.

I hope you continue to have a very productive and successful Software Developers Conference. I regret missing what will be an important conference.

Sincerely,

jim farmer

Subject: Questions for the FSA Software Developers Conference

From: Jim Farmer <jxf@immagic.com>

Date: Fri, 14 Aug 2009 11:01:36 -0400

To: Mary Haldane <mary.haldane@ed.gov>

I have been told that email attachments are not permitted in communications to the Department. I have some question which I hope can be discussed at the FSA 2009 Software Developers Conference. These have been sent to you by USPS mail; the text is reproduced below.

There are two general concerns. There are sharply divergent views of the application of the December 2008 FERPA rules. Knowing whether FSA data requires Level of Assurance 1 or LOA2 would narrow the interpretation and technologies that can be used (as well as local processes). This is similar to the question I asked last year. I am not expecting an answer at the Conference since coordination with the Department may be required. The critical area is student access to their FSA data held by the college or university.

The second is the number of real-time networks that will be implemented within the next 24 months. Several of us would like to achieve some commonality to reduce the high costs of software maintenance and associated automated and manual control processes. The presentations at the recent NCES STATS-DC conference suggest about 25 state education agencies will be communicating K-12 student data with colleges and universities identified to a specific student. Most of these will be using stimulus funding for the immediate installation and implementation of these systems. So far there is no community consensus about common standards for data transport. It would be helpful to know if any of the technologies proposed so far have been rejected by FSA and should be avoided. The comments last year suggests real-time data exchanges using messaging is not yet an FSA planning priority; likely this is still the case.

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