MERGER MANIA!

The Mash-up of Security Training at FMS and BPD

The Bureau of the Public Debt & the Financial Management Service

- Sister agencies within Treasury Department, both reporting to the same Assistant Secretary.
- Old adage: BPD borrows the money, while FMS writes the checks.
- Work closely together on several issues, including the Daily Treasury Statement.
- BPD in DC & WV; FMS in six locations.
- FMS has ~1600 employees; BPD has ~2000.

- Idea to merge the IT functions into one common organization (ONLY the IT functions).

- Reduce from five data centers to just two.

- BPD assumes operational functions (adding 99 employees transferred in place from FMS).

- FMS assumes policy functions, including security (transferring 6 employees).

- Significant savings, but not a sign that the two overall entities will merge into one.

Security Program Backgrounds

Financial Mgmt. Service

- Strong CSIRC component – Threat Management
- Heavier emphasis on documentation (policies, SOPs, project plans, etc.)
- Contractor utilization
- More layers for approval

Bureau of the Public Debt

- Strong awareness program (emphasis on real stories through several venues)
- ISS-LoB Franchising
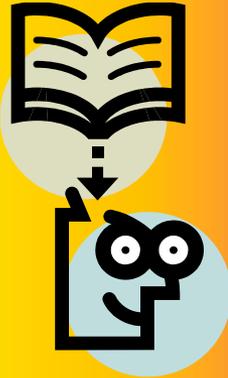- Low-cost location with stable workforce
- Just one layer to CIO

Despite the fact that both programs have been consistently evaluated by IG and GAO auditors as being in full compliance, we quickly discovered lots of differences, making merger more difficult.

"We say tomato, you say tomato"

Different Strokes for Different Folks

- Rules of Behavior: FMS has several; BPD has generic (new Fiscal IT version still under development)

- New employee orientation: 15 minutes at FMS, 50 minutes at BPD (Rules of Behavior a major driver)

- End User: a half day class required for new employees at BPD. Covers security issues in greater depth. Focuses on past incidents. No similar training at FMS.

- [Note that there are numerous policy differences, such as FMS allows access to Facebook and personal e-mail accounts, which are not allowed at BPD.]

Differences on Same Courses

- Treasury requires Privacy & Cybersecurity on-line tutorials each year for all employees.
- BPD always tried to release these ASAP (preferably before Christmas) with long window for completion (with follow-ups).
- FMS preferred a shorter window with a more focused emphasis on completing the courses.
- Also, TLMS coordination and support differed.

Specialized Training

- All agencies are required to identify employees with significant security responsibilities and ensure they get specialized training each year.
- Slightly different methods in identifying who needs this.
- FMS provides list of recommended SkillSoft on-line tutorials and puts them into TLMS. Employees could get credit in other ways but they had the responsibility to justify.
- BPD suggested SkillSoft courses, but put more freedom on the employees to use other training courses or conferences. The primary responsibility was on the security training analyst to determine if class could count.
- With BPD more isolated, more classes were provided in-house, requiring an analysis of whether they should count (often in advance of the class so it could be publicized).
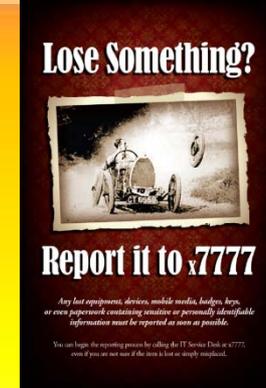
More Variations

- FMS Contractor provided a specialized training program for all ISSOs. [BPD had considered such classes, but hadn't yet got around to it.]

- PO&AM mgmt. classes had been held in both organizations, but content was different.

- BPD & FMS had developed in-house classes on other specific topics as needed (CSIRC, Privacy, etc.), but were inherently different.

- On-boarding new contractors also different.

- ISSR tradition at BPD but not at FMS.

Poster Program

- Even something as simple as security posters became more complicated.

- All posters are now to cover both organizations, meaning both helpdesk numbers must show.

- BPD had designated bulletin board space for numerous 11x17 paper posters.

- FMS used foamcore mounted posters on tripods, and fewer 18x24 glossy posters.

- Desired topic had been previously covered.

Philosophical Divergence

- Newsletters: FMS had none, and the culture is not accustomed to concept. Since the '90s, BPD has had a mandatory quarterly newsletter PLUS a monthly one.

- Reminders: FMS had ad hoc e-mails, but BPD has monthly security reminder on intranet home page.

- Intranet: Major difference in look and feel. BPD has "Information Security " quick link on homepage.

- Security column in BPD quarterly magazine.

- FMS doesn't publicize incidents, but BPD puts major emphasis on real life stories. Virus victim stories, CSIRC incidents, etc. Readership was interactive.

The Bottom Line

- It can be done—it just takes a lot of work.
- Consolidation is complicated, so plan ahead.
- Understandably, the major focus was on hardware and software issues, not cultural and program issues.
- Even performing similar functions in full compliance can still mean major differences.
- *Yes, FMS & BPD recently announced overall merger to become Fiscal Service. [Now everybody else gets to see how complicated a consolidation can be!]*

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