October 31, 2011

MEMO TO: Mr. Rick Becker
           NITC Administrative Manager

FROM: Tom Jensen, Chief Administrator
           Nebraska Department of Agriculture

SUBJECT: Request for Exemption to NITC Standard

The Nebraska Department of Agriculture (NDA) requests a waiver to the NITC Identity and Access Management Standard for State Government Agencies. The specifics of our request are found in the attached.

NDA is currently in the process of upgrading our existing Nebraska Animal Health Permit System (NAHPS). This system allows NDA to have notification of the movement of animals with heightened disease risk prior to their movement into Nebraska, a statutory requirement. It also allows veterinarians issuing the Certificate of Veterinary Inspection (CVI) to verify all State of Nebraska animal import requirements have been met, prior to the movement of animals.

The upgrade will provide a web-based portal, allowing private veterinarians web-based access to the import system 24 hours a day, 7 days a week, 365 days a year. Currently, these veterinarians must call into our offices to obtain a pre-entry permit. The current system is a manual system, requiring veterinarians to call into NDA headquarters and answer questions from staff before being issued the permit. It is particularly problematical during off hours, when this communication must be made through an answering service. The web-based interface will speed up the process, ensuring that the veterinarian receives the needed permit while NDA receives the necessary information to fulfill statutory requirements. The only exception to the 24 hours a day, 7 days a week, 365 days a year will be regular, scheduled maintenance and, as needed, emergency maintenance.

Thank you for your consideration of this request. Please contact me if you have any questions.

Attachment

Agency Information:

Agency Name:
Agency Name: Nebraska Department of Agriculture (NDA)

Contact People:
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Title of the NITC Standards and Guidelines:
Identity and Access Management Standard for State Government Agencies

Description of the Problem or Issue:

1.   The current project to upgrade the existing Nebraska Animal Health Permit
      System (NAHPS) to accommodate Web Import Permit Processing was
      negotiated based on the availability of funds. ERC Computing Services, LLC
      (ERC) is providing a scaled solution to complete this upgrade within the provided
      budget. If major components of the existing NAHPS have to be re-engineered to
      browser-based, in-house components, then the cost of the upgrade will at least
      double in total cost, which would be a significant financial hardship to the agency.

2.   Conversion to a total browser-based module system could also result in the
      possible loss of existing NAHPS functionality, such as direct scanning of critical
      documents which are used to support the permitting process. The current
      scanning modules are integrated into the existing modules, so users can simply
      activate a record and then scan the associated document(s) with a single-button
      operation. Although centralized scanning could be used, it would require several
      steps to complete the same operation, including the need for the user to leave
      their desk to go to the central copy machine/scanner, scanning the document,
      and then returning to their desk to rename and attach the document to the
      associated record. In addition, the existing scanning equipment could be
      rendered useless, which would add to the cost of the project.

3.   ERC is committed to providing a secure web solution which is consistent with the State's IT Standards and Guidelines, as set down by the NITC. ERC guarantees that it will ensure that all possible precautions will be taken to protect Nebraska information. ERC has an Information Systems Audit and Control Association (ISACA), Certified Information Systems Auditor (CISA), Ed Rybicki, on staff to ensure that the provided web solution meets these standards.

Description of the agency's preferred solution, including a listing of the specific requirements for which a waiver is requested:

Security and Login Credentials Differences

The upgrade to NAHPS uses two security systems for the two components: Windows and Web. The Windows component uses the same security that has been in place since the system's inception and is grandfathered in under existing rules and standards. The web component uses the Microsoft .Net v2.0 framework security classes and data structures. The security classes are part of the base libraries used as a framework for the web components and were the basis for current project plan and budget.

The Microsoft .Net v2.0 security features, as implemented, include:

- Hashed password storage.

- Passwords can never be viewed, even by an administrator. Passwords can only be changed by security administrators, if lost or expired.

- Password policies like strength can be set by the system administrator and will follow the State's requirements.

- Users are in roles. Roles and users can be granted or denied specific capabilities within the application. Authenticated web users can only view information associated with their unique user id.

- The web component is used to access public information. The users are primarily veterinarians who work outside the government. Only registered users can access the web component. Almost all the users of the web component are outside the scope of the State government identity initiative. There is little benefit in using the same identity system. However, we can establish a policy where any government user will use the same user name to simplify accountability.

- The current Import Processing System has around 15,000 veterinarians included in its existing database. Attempting to issue individual credentials to these existing veterinarians would be a massive task. As veterinarians use the new system, their logins will be matched against the existing database. In addition, the new system was designed to assist NDA with gathering veterinarian Federal

Accreditation numbers which will become a part of the two-level access authentication required to receive an animal import permit.

Data Access Controls

The NAHPS is designed to be a one-way, rules based system. NDA administrators determine who will receive a permit after logging into the system by establishing the processing rules for each possible combination of veterinarian requests, in accordance with existing State statutes. Hence, users are only allowed to enter data in predetermined fields after their credentials are established. After processing the entries, the system will assign a permit number to the veterinarian and will display this for their use. In addition, a PDF copy of the permit will be created for the user to download.

The only site searching allowed is for the user to be able to access links to existing State statute documents, which currently exist on the NDA web site. Administrators have been given a field to enter this link during rules creation.

Any additional information and justification showing good cause for the requested waiver:

A further justification for approving this request is that the existing NAHPS system was specifically designed to manage animal movement permits and has been doing so for almost six (6) years. This mature system does not have to undergo massive redesign or reprogramming to accommodate browser-based, web permit processing. ERC has already converted the existing file database to SQL to become compliant with industry standards for web processing. Adding a web processing component has simply become a major upgrade to allow this functionality and to do it in the most cost-effective manner.

Considering the state of the current economy for the State of Nebraska, the savings in upgrading the current NAHPS versus attempting to completely re-engineer the current system is considerable.

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