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| Department of Veterans Affairs | | | Memorandum |
| Date: | January 16, 2019 |  | |
| From: | David Catanoso, Director, Enterprise Cloud Solutions Office (ECSO) , VA IT Enterprise Program Management Office (EPMO), Office of Information and Technology (OIT) | | |
| Subj: | Request for Exception to use Amazon Snowball | | |
| To: | EPMO and OIT Project PMs managing projects in VA Enterprise Cloud (VAEC) | | |

**BACKGROUND:**

1. In January,2019 VAEC requested an Exception to use Amazon Snowball. Several other projects in VAEC will also requested use of Snowball
2. In 2018, the ECSO, a division of the Enterprise Program Management Office (EMPO), launched the VAEC, a multi-vendor cloud development, test, pre-production and production environment which can support low, moderate, or high FISMA impact levels.
3. Supporting Policy Memos
   1. On January 16, 2018, Executive Director, Strategic Sourcing, Executive Director Demand Management Division, jointly issued a policy memo on the “Use of the VA Enterprise Cloud (VAEC) to Host Applications.”
   2. On April 10, 2018, Deputy Assistant Secretary (DAS), EPMO issued a policy memo on “Use of Software-as-a-Service (SaaS), Managed Services, and Cloud-Based Native Technologies and Approaches”
      1. In this memo, DAS EPMO directs the ECSO to require the use of cloud native technologies and approaches with the VAEC-AWS and VAEC-Azure environments whenever optimal for the implementation of VA Cloud Strategy
      2. This memo also establishes ECSO as the governing authority for the approaches used to implement cloud native technology and processes.
   3. On January 7, 2019, Principal DAS (PDAS), OIT issued a policy memo mandating the use of the VAEC for New Development.

**EXCEPTION SUMMARY:**

1. Based on analysis done in cooperation with Amazon Engineering team, the ECSO has determined that an Exception is warranted for the use of Amazon EFS. In summary:
   1. AWS Snowball is a service that accelerates transferring large amounts of data into and out of AWS using physical storage devices, bypassing the Internet. Each AWS Snowball device type can transport data at faster-than internet speeds. This transport is done by shipping the data in the devices through a regional carrier. The devices are rugged shipping containers, complete with E Ink shipping labels. With a Snowball, you can transfer hundreds of terabytes or petabytes of data between your on-premises data centers and Amazon Simple Storage Service (Amazon S3).
   2. AWS Snowball is scheduled for submission by Amazon to FedRAMP for assessment and authorization.
   3. The VAEC has reviewed and approved Configuration for use.
   4. If VAEC does not receive a VA ECSO Exception to use Amazon Snowball in VAEC AWS, VAEC will be required to implement a sub-optimal custom solution service that prevents transfer of large amounts of data into and out of AWS using physical storage devices, bypassing the Internet. This can result in issues with data transfer, availability and performance in production, and exposure of data to the Internet. In addition to these issues VAEC will incur significant cost and schedule delays in developing and testing a custom solution to transport data faster than the internet and to maintain and support it over time. The VAEC Exception request and analysis dated January 2019 is on file with ECSO.
   5. Other VA projects will be able to accelerate their migration to the cloud and realization of ROI by using Snowball vs building a custom transport of data faster than the internet solutions in AWS.

**EXCEPTION DURATION AND CONDITIONS**:

1. Based on this rationale, the ECSO grants a Cloud Native Tool Exception to be added to VAEC AWS GOVCLOUD High Accessing from the date of this memo for the use of AWS EFS while Amazon is pursuing and either receives FedRAMP approval for AWS Snowball or the ECSO rescinds this Exception.
2. VBMS or any other project teams using Amazon Snowball should contact the ECSO immediately if any material changes occur regarding the use of Amazon Snowball which could negatively impact the security or performance of the VAEC.

Approved By:

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David Catanoso

Director, ECSO