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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 Exceptions to use Amazon Snowball Edge | | |
| To: | EPMO and OIT Project PMs managing projects in VA Enterprise Cloud (VAEC) | | |

**BACKGROUND:**

1. In January,2019 VAEC requested a Exceptions to use Amazon Snowball Edge. Several other projects in VAEC also requested use of Snowball Edge.
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.

**EXCEPTIONS SUMMARY:**

1. Based on analysis done in cooperation with Amazon Engineering team, the ECSO has determined that a Exceptions is warranted for the use of Amazon Snowball Edge. In summary:
   1. The AWS Snowball Edge is a type of Snowball device with on-board storage and compute power for select AWS capabilities. Snowball Edge can undertake local processing and edge-computing workloads in addition to transferring data between local environment and the AWS Cloud. Each Snowball Edge device can transport data at speeds faster than the internet. This transport is done by shipping the data in the appliances through a regional carrier. The appliances are rugged shipping containersautomated E Ink shipping labels, built in real-time location tracking, and 256 bit AES encryption of all data. The AWS Snowball Edge device differs from the standard Snowball because it can bring the power of the AWS Cloud to your on-premises location, with local storage and compute functionality.
   2. AWS Snowball Edge is scheduled for submission by Amazon to FedRAMP for assessment and authorization.
   3. The VAEC has reviewed and approved Config for use.
   4. If VAEC does not receive a VA ECSO Exceptions to use Amazon Snowball Edge in VAEC AWS, VAEC will be required to implement a sub-optimal custom solution for undertaking local processing and edge-computing workloads in addition to transferring data between local environment and the AWS Cloud. This could result in issues with data transfer, availability and performance in production. In addition to these issues VAEC will incur significant cost and schedule delays to develop and test a custom solution for undertaking local processing and edge-computing workloads, and to maintain and support it over time. The VAEC Exceptions 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 Edge vs building a custom solution for undertaking local processing and edge-computing workloads in AWS.

**EXCEPTIONS DURATION AND CONDITIONS**:

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

Approved By:

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David Catanoso

Director, ECSO