



Chief Information
Officer

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT
Washington, DC 20415

MEMORANDUM FOR ALL ASSOCIATE DIRECTORS AND OFFICE HEADS

THROUGH: DAVID L. DEVRIES
CHIEF INFORMATION OFFICER

FROM: JASON D. KRUSE
CHIEF IT ENTERPRISE ARCHITECT

Subject: OPM OPEN SOURCE SOFTWARE POLICY

David L. Devries
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1. Purpose. The purpose of this policy is to establish the Office of Personnel Management's (OPM) policy on open source software. This policy pertains to the development and publication of OPM developed software and establishes the responsibilities of the organization for compliance with Office of Management and Budget's (OMB) open source policy. Specifically, the policy includes the following:

- a. A rationale for implementing open source code produced by/for the agency; and
 - b. The incorporation of [M-16-21](#), OMB's Federal Source Code Policy: Achieving Efficiency, Transparency, and Innovation through Reusable and Open Source Software requirements.
2. Background. The Office of the CIO is committed to a digital transformation of OPM through the use of transparent, open source code.
3. Applicability. This policy applies to all of OPM.
4. Policy. This policy requires OPM organizations to account for and publish their open source code in accordance with [OMB M-16-21](#) including:
- a. A new baseline of software development and acquisition that supports an open source approach as it promotes OPM's Digital Transformation goal;
 - b. A posture of being transparent and requiring justification for new custom code that will not be published as open source;
 - c. A publication process that is the responsibility of the organization releasing code;
 - d. An adherence to releasing open source code through a public-facing software version control platform, including code developed by OPM personnel and contractors;

e. For contracts that include custom code development, the contracts must follow OMB's three-step software analysis outlined in M-16-21 and include contract requirements for open source code requirements when applicable. Contracts for custom development of software must also acquire and enforce rights sufficient to enable Government-wide reuse of custom-developed code (Note: Further collaboration to occur with the OPM Chief Procurement Officer outlining procedures regarding contracts and open source software (OSS));

f. Custom software developed internally at OPM must follow OMB's three-step software analysis outlined in M-16-21 and be licensed for Government-wide reuse; and

g. The inclusion of a metadata file in each project's source code repository. The metadata file will contain information about the project that can be included in OPM's code inventory.

5. Responsibilities. Reporting and cataloging efforts will be conducted within the Enterprise Architecture and Quality Assurance branches under the Associate CIO for Strategy and Policy. OPM is responsible for the following:

a. Establishing an internal policy that incorporates M-16-21 requirements and publishing this policy on <https://www.opm.gov/about-us/open-government/digital-government-strategy/>;

b. Being transparent for implementation of all code with custom code not being compliant requiring justification for not being so;

c. Inventorying all new code developed after August 8, 2016 using a standard file format established by OMB;

d. Moving to a standard source code repository as identified by the EA allowing for future compliance via automation;

Publishing all new open source code, barring some exceptional request. This allows OPM to exceed the OMB [M-16-21](#) policy mandate of 20 percent code release for new code; and

e. Publishing the inventory JSON on <https://www.opm.gov/about-us/open-government/digital-government-strategy/code.json>.