



Office of Inspector General

Appalachian Regional Commission

February 6, 2026

Report Number 26-17

Executive Director McBride:

While performing work of the Office of Inspector General, we reviewed the current state of the Commission's cybersecurity and information security program and identified some areas for improvement that we would like to bring to your attention.

The Commission must follow a series of information security standards that provide for the protection of ARC information assets. The Commission follows government and industry standards and maintains a general application of the National Institute of Standards and Technology (NIST) non-regulatory standards for its cybersecurity and information security policy.

We found the ARC Information Technology (IT) Department has insufficient formal written policies and procedures for several control areas of its information security program. Instead, the IT department refers to informal internal documents, or general staff knowledge, for guidance on these specific areas of information security.

Improving the IT system's internal controls through formal written policies and procedures would allow ARC to better identify and timely address system vulnerabilities that could compromise the system's integrity. Having a standardized and comprehensive set of documented policies and procedures would provide a higher level of assurance that the Commission has taken the proper steps to maintain the security of its IT system.

Recommendations:

1. The Commission conduct an information security risk assessment and develop and implement comprehensive written policies and procedures for all areas of the information security program.
2. The Commission develop and implement a quality review system to review and revise information security policies and procedures on an annual basis, in accordance with previously established Commission standards.

In the next 30 days, please provide me with your management decisions describing the specific actions that you will take to implement each recommendation.

Sincerely,

Clayton Fox
Inspector General