



U.S. GOVERNMENT PUBLISHING OFFICE

OFFICE OF INSPECTOR GENERAL

**MANAGEMENT LETTER
REPORT NUMBER 17-05**

**Information Technology
FY 2016 Financial Statements**

January 19, 2017



Date

January 19, 2017

To

Director, U.S. Government Publishing Office

From

Inspector General

Subject:

Information Technology—FY 2016 Financial Statements
Report Number 17-05

In connection with the audit of the U.S. Government Publishing Office's FY 2016 financial statements, the Office of Inspector General (OIG) is providing the attached letter to describe comments and recommendations intended to improve internal controls associated with financial accounting computer systems. The findings and recommendations are detailed in the attached management letter.

We appreciate the courtesies extended to KPMG and to our audit staff. If you have any questions or comments about this report, please do not hesitate to contact me at (202) 512-0039.

A handwritten signature in black ink that reads 'Michael A. Raponi'.

MICHAEL A. RAPONI
Inspector General

Attachment

cc:

Deputy Director, U.S. Government Publishing Office
General Counsel
Chief of Staff
Chief Financial Officer

United States Government Publishing Office

**Findings over Information Technology Controls Identified
During the Fiscal Year 2016 Consolidated Financial
Statement Audit**

**U.S. Government Publishing Office
Findings over Information Technology Controls Identified During the
FY 2016 Consolidated Financial Statement Audit**

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KPMG LLP
Suite 12000
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December 15, 2016

Director
United States Government Publishing Office

Office of the Inspector General
United States Government Publishing Office:

In planning and performing our audit of the consolidated financial statements of the United States Government Publishing Office (GPO), as of and for the year ended September 30, 2016, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to the financial audits contained in the *Government Auditing Standards*, issued by the Comptroller General of the United States, we considered GPO's internal control over financial reporting (internal control) as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the consolidated financial statements, but not for the purpose of expressing an opinion on the effectiveness of GPO's internal control. Accordingly, we do not express an opinion on the effectiveness of GPO's internal control.

During our audit we noted certain matters involving internal control and other operational matters that are presented for your consideration. These comments and recommendations, all of which have been discussed with the appropriate members of management, are intended to improve internal control or result in other operating efficiencies and are summarized in Appendix A to this report. Appendix B presents the status of prior year findings. Comments involving internal control and other operational matters that do not relate to information technology systems were communicated to you in a separate letter dated December 15, 2016.

Our audit procedures are designed primarily to enable us to form an opinion on the consolidated financial statements, and therefore may not bring to light all weaknesses in policies or procedures that may exist. We aim, however, to use our knowledge of the GPO's organization gained during our work to make comments and suggestions that we hope will be useful to you.

We would be pleased to discuss these comments and recommendations with you at any time.

The purpose of this letter is solely to describe comments and recommendations intended to improve internal control over information technology or result in other operating efficiencies. Accordingly, this letter is not suitable for any other purpose.

Very truly yours,

KPMG LLP

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Appendix A – Findings and Recommendations

I. Summary of Findings

Implementing effective IT controls and continuously monitoring those controls is an ongoing challenge at the GPO and other Federal entities. Our IT findings and recommendations are summarized below, by Federal Information Systems Audit Controls Manual (FISCAM) area.

Access Controls

In close concert with an organization's entity-wide information security program, access controls for general support system (GSS) and applications should provide reasonable assurance that computer resources such as data files, application programs, and computer-related facilities and equipment are protected against unauthorized modification, disclosure, loss, or impairment. Access controls are facilitated by an organization's entity-wide security program. Such controls include physical controls, such as keeping computers in locked rooms to limit physical access, and logical controls, such as security software programs designed to prevent or detect unauthorized access to sensitive files. Inadequate access controls diminish the reliability of computerized data and increase the risk of destruction or inappropriate disclosure of information.

During our fiscal year (FY) 2016 IT control testing, we noted that access controls could be improved. Noted below are specific areas for improvement:

- NFR IT 2016-02 – Weakness Identified in the New GSS Administrator Process
- NFR IT 2016-03 – Weaknesses Identified in the GPO Oracle Financials (GBIS) Separated User Process

Segregation of Duties

Effective segregation of duties starts with effective entity-wide security program and access control policies and procedures that are implemented at the network and application levels. Work responsibilities should be segregated so that one individual does not control all critical stages of a process. For example, while users may authorize program changes, programmers should not be allowed to do so because they are not the owners of the system and do not have the responsibility to see that the system meets user needs. Similarly, an individual should not be able to create vendors and initiate and approve payments to vendors.

The objectives of limiting access are to ensure that users have only the access needed to perform their duties; that access to sensitive resources, such as security software programs, is limited to few individuals; and that employees are restricted from performing incompatible functions or duties beyond their responsibility. This is reiterated by Federal guidelines. For example, Office of Management and Budget (OMB) Circular A-130 and supporting National Institute of Standards and Technology (NIST) publications provide guidance related to the maintenance of technical access controls.

During our FY 2016 IT control testing, we noted that segregation of duties controls could be improved. Noted below is a specific area for improvement:

- NFR IT 2016-04 – Weaknesses Identified in the GBIS Segregation of Duties Policy

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Contingency Planning

Losing the capability to process, retrieve, and protect information maintained electronically can significantly affect an agency's ability to accomplish its mission. For this reason, an agency should have: 1) procedures in place to protect information resources and minimize the risk of unplanned interruptions and 2) a plan to recover critical operations should interruptions occur. These plans should consider the activities performed at general support facilities, such as data processing centers and telecommunications facilities, as well as the activities performed by users of specific applications. To determine whether recovery plans will work as intended, they should be tested periodically in disaster simulation exercises. If controls are inadequate, even relatively minor interruptions can result in lost or incorrectly processed data, which can cause financial losses, expensive recovery efforts, and inaccurate or incomplete financial or management information.

During our FY 2016 IT control testing, we noted that contingency planning controls could be improved. Noted below is a specific area for improvement.

- NFR IT 2016-01 – Lack of Finalized and Approved GSS Contingency Plan

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II. Detailed Findings and Recommendations

Access Control

NFR-IT-2016-02 – Weakness Identified in the New GSS Administrator Process

During our testing over the Server Administrator role for the GPO GSS, we selected a sample of two new users out of a total of nine new users for the year. For one of the users selected, GPO management was unable to provide the user's authorization documentation to support that access was properly authorized prior to granting access to the user.

GPO Directive 825.33B: Information Technology (IT) Security Program Statement of Policy, dated May 2011, states:

“The GPO will safeguard its IT systems through the implementation of the GPO IT Security Program, which will accomplish the following:
d. Ensure that only authorized personnel have access to information;”

NIST Special Publication 800-53, Security and Privacy Controls for Federal Information Systems and Organizations, Revision 4, Control AC-2, Account Management, states:

“The organization:
i. Authorizes access to the information system based on:
1. A valid access authorization;
2. Intended system usage; and
Other attributes as required by the organization or associated missions/business functions;”

The user's server administrator account did not have the necessary documentation associated with it due to management oversight.

Without consistent, proper documentation over authorization of new GSS administrator accounts there is a risk that users are granted unauthorized access to privileged accounts and increases the risk that the confidentiality and integrity of information and information systems will be compromised.

We recommend that the Chief Information Officer (CIO) implement policies and procedures to ensure that all documentation is maintained to support access authorization.

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NFR-IT-2016-03 – Weaknesses Identified in the GBIS Separated User Process

During the FY 2016 audit, we obtained a listing of 123 former employees that separated from the GPO during the current year and noted that one of these users retained active access to their account 47 days after their Human Capital (HR) separation date, which is two days longer than GPO's policy of 45 days. Additionally, we noted that GPO's separated user policy related to removing a user within 45 days of their separation from GPO is not restrictive enough to protect against the threat of an unauthorized user accessing GPO infrastructures. We noted similar issues since FY 2011.

GPO Directive 825.33B: Information Technology (IT) Security Program Statement of Policy, dated May 2011, pages 11-14, states:

“Access will be denied to individuals who have been terminated, or at the discretion of management, to those that are the subject of adverse personnel actions.”

“Each system will have a process in place that ensures individuals are denied access to the system when employment is terminated, at the discretion of management, or are the subject of adverse personnel actions.”

GPO's Procedure for Removing Access for Separated GPO Employees to Select IT Systems (LAN, PICS, Mainframe, Remote Access, GBIS and NFC), page 2, states:

“The overall GPO requirement for access removal for Separated GPO Employees is within 45 days of official Separation Date for that GPO Employee as listed on the official Separation Report from the Human Capital Office.”

NIST Special Publication 800-53, Security and Privacy Controls for Federal Information Systems and Organizations, Revision 4, Control PS-4, Personnel Termination, states:

“The organization, upon termination of individual employment:

- a.* Disables information system access within [Assignment: organization-defined time period];
- b.* Terminates/revokes any authenticators/credentials associated with the individual”

This user's account did not make it to the IT Security group until over a month after the user's separation date because of a processing lag time between the National Finance Center (NFC) and the HR bi-weekly reports promulgated by HR management. Once IT Security was notified that they needed to remove the user's account, they were unable to do so timely because of staff availability and competing GBIS access administration priorities during that timeframe.

Although the user did not access their GBIS account after their HR separation date, failure to disable user access immediately upon termination increases the risk that the confidentiality and integrity of information and information systems will be compromised.

We recommend that the CIO:

1. Update Standard Operating Procedures around user separations to align with the promulgation of the bi-weekly HR separations report; and
2. Communicate and reiterate to individuals responsible for communicating separated users, on a pre-defined frequency, GPO's requirements for access removal of separated GPO employees.

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Segregation of Duties

NFR-IT-2016-04 – Weaknesses Identified in the GBIS Segregation of Duties Policy

During the FY 2016 audit, we noted GBIS segregation of duties (SOD) matrix is documented based on user responsibilities whereas the GBIS user listing is documented based on user roles. Therefore, the procedures and user listing do not align with makes it difficult to determine whether access was appropriately segregated for each user within the GBIS application. We noted similar issues since FY 2011.

GPO Directive 825.33B states:

“Access controls will enable the use of only the resources, such as data programs, necessary to fulfill an individual’s job responsibilities and will enforce separation of duties based on roles and responsibilities.”

NIST SP 800-53, Revision 4, *Recommended Security Controls for Federal Information Systems and Organizations*, Control AC-5, *Separation of Duties*, states:

“... The organization:

1. Separates duties of individuals as necessary, to prevent malevolent activity without collusion,
2. Documents separation of duties; and
3. Implements separation of duties through assigned information system access authorization.”

The GBIS SOD Matrix has not been updated due to the continued testing of the Oracle Governance, Risk, and Compliance (GRC) Module which is being implemented to automate the SOD. This has not yet been completed due to the scheduled Oracle R12 upgrade in early FY 2017.

Without the proper alignment of the segregation of duties procedures and the system user listing it makes it difficult for management to identify and monitor users with conflicting roles and responsibilities. This increases the likelihood that users with conflicting roles and responsibilities can go undetected.

We recommend that the CIO:

1. Complete the upgrade of Oracle R12 and implementation of the GRC tool on schedule; and
2. Update the GBIS SOD Matrix to clearly identify conflicting system roles in the GBIS application.

Contingency Planning

NFR IT 2016-01 – Lack of Finalized and Approved GSS Contingency Plan

During the FY 2016 audit, we noted that GPO has not finalized, approved, and fully tested the draft contingency plan for its general support system. We noted similar issues since FY 2011.

GPO Publication 825.33, *Information Technology Security Program Statement of Policy*, states:

“The GPO will safeguard its IT systems through the implementation of the GPO IT Security Program, which will accomplish the following: Define, document, and manage

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the contingency planning process, including training and testing, to provide IT systems with adequate continuity of operations upon disruption of normal operations.

The Chief Information Officer (CIO) is responsible for developing and maintaining an agency-wide IT Security Program, including providing for the continuity of operations in the event of system disruption. Contingency plan means a plan for emergency response, back-up operations, and post-disaster recovery for IT systems and installations in the event normal operations are interrupted. The contingency plan should ensure minimal impact upon data processing operations in the event the IT system or facility is damaged or destroyed.”

NIST Special Publication 800-53 Revision 4, *Recommended Security Controls for Federal Information Systems*, Control CP-2, *Contingency Plan*, states:

The organization:

- a. Develops a contingency plan for the information system that;
 1. Identifies essential missions and business functions and associated contingency requirements;
 2. Provides recovery objectives, restoration priorities, and metrics;
 3. Addresses contingency roles, responsibilities, assigned individuals with contact information;
 4. Addresses maintaining essential missions and business functions despite an information system disruption, compromise, or failure;
 5. Addresses eventual, full information system restoration without deterioration of the security safeguards originally planned and implemented; and
 6. Is reviewed and approved by [Assignment: organization-defined personnel and roles]”

NIST Special Publication 800-53 Revision 4, *Recommended Security Controls for Federal Information Systems*, Control CP-4, *Contingency Plan Testing and Exercise*, states:

- “... The organization:
- a. Tests and/or exercises the contingency plan for the information system ... to determine the plan’s effectiveness and the organization’s readiness to execute the plan; and
 - b. Reviews the contingency plan test/exercise results and initiates corrective actions.”

GPO management did not finalize, approve, and fully test the contingency plan for the GSS due to the Office 365 project was not complete. Without an effective contingency plan and testing process in place, GPO may not be able to successfully recover critical applications and systems to maintain business functions during the event of a service disruption.

We recommend that the CIO:

1. GPO management finalizes and approves the contingency plans for GPO’s General Support System; and

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2. GPO management periodically performs contingency plan testing and documents the test plans and the results for GPO's General Support System.

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Appendix B – Status of Prior Year’s Findings

Prior Year Finding Number	Applicable FISCAM Section	Description of Control Weakness	Status of Recommendation	Current Year NFR Number
NFR-IT-2015-02	Access Controls	Weaknesses Identified in the GBIS Termination Process	Open	NFR-IT-2016-03
NFR-IT-2015-03	Segregation of Duties	Weaknesses Identified in the GBIS Segregation of Duties Policy	Open	NFR-IT-2016-04
NFR-IT-2015-05	Contingency Plan	GSS contingency plan not finalized	Open	NFR-IT-2016-01

Appendix C – Acronyms

<u>Acronym</u>	<u>Definitions</u>
CIO	Chief Information Officer
FISCAM	Federal Information System Controls Audit Manual
FY	Fiscal Year
GBIS	GPO Oracle Financials
GSS	General support system
GPO	United States Government Publishing Office
IT	Information Technology
KPMG	KPMG LLP
NFR	Notice of Finding and Recommendation
NIST	National Institute of Standards and Technology
OIG	Office of Inspector General
OMB	Office of Management and Budget
SP	Special Publication