UNITED STATES OF AMERICA



FEDERAL LABOR RELATIONS AUTHORITY OFFICE OF THE INSPECTOR GENERAL

WASHINGTON, D.C. 20424-0001

FLRA Inspector General FY 2003 Evaluation of FLRA's Compliance With The Federal Information Security Management Act of 2002

Background: The Federal Information Security Management Act of 2002 requires Inspectors General to perform annual independent evaluations of Agency security programs and practices. The FLRA Inspector General performed a comprehensive Computer Information Security Audit in FY 2001 which revealed that the FLRA had substantial security vulnerabilities in its Computer Information Program and that management needed to immediately focus on its technology and computer information security programs to ensure protection of FLRA information as well as to be able to implement e-government in the future.

As a follow-up to the Inspector General audit recommendations, FLRA management engaged the services of a private sector consultants to perform a detailed review of the FLRA's information technology support structure which included specific assessments of the Information Resource Management Division (IRMD)organization, staffing resource levels, funding levels, strategies, information technology, and performance management. As a result of this consultation, FLRA management was provided detailed technically oriented recommendations to support the FLRA's Information Technology Program.

During this past year, FLRA management has focused on its computer information technology deficiencies identified by the FY 2001 Inspector General audit. This information is provided as an attachment. In FY2002, the Chairman, FLRA created and filled a Chief Information Officer position. The FLRA Chief Information Officer has drafted planning, policy and procedures which need to be approved by the Chairman, implemented and supported by management.

FISMA Reporting

FISMA requires that each agency's report include information regarding the following former GISRA requirements:

- 1) Agency risk assessments
- 2) Security policies and procedures.
- 3) Individual system security plans
- 4) Training
- 5) Annual testing and evaluation
- 6) Corrective Action Process
- 7) Security Incident Reporting
- 8) Continuity of Operations

FISMA also requires each Agency to develop specific system configuration requirements that meet their needs and ensure compliance with them with continuous monitoring and maintenance. This monitoring must include the testing of management, operational and technical controls. It must also assess risks, and identify systems which are not certified or accredited (NIST requirements.) FISMA also codifies an ongoing policy requirement that each system security

program have provisions for continuity of operations. FISMA requires that each agency have a senior Information Security Officer appointed by the agency CIO who reports to the CIO and carries out the security information responsibilities. The FLRA has not yet complied with these requirements. Although the Director, Information Resource Management (IRM) and the CIO have formulated a corrective action plan for previous FLRA Inspector General information security findings, they have not yet created an agency wide Plan of Action and Milestone (POA&M) Process which relates to performance measures and provides a quantitative rather than just narrative response. The CIO has worked with two contractors to develop information security policy and procedures, which will strengthen the FLRA's computer information security when implemented. This past year was a productive security information year in respect to planning and migrating to Windows 2000. Also, according to the FLRA CIO, the FLRA has responded to all external government wide information security information mandates and is in compliance with NIST.

Inspector General Comments:

Over this past year, the FLRA has focused on trying to improve its security information program. This program currently has several significant deficiencies which include not yet having a clear cut operational information security plan, not yet performing adequate annual program and system reviews, not providing standardized training for agency employees (and contractors) and not yet maintaining an agency-wide system POA&M (related to function). The FLRA still needs to improve its filter and patch management to reduce penetration risks and implement appropriate software to support penetration testing. Line authority (Information Resource Management Director, Chief Information Officer, and Security Officer) should interact and communicate with each other more to improve computer information security operations. The working relationship between the CIO and technical Information Resource Management Division staff needs to be improved by more informative and technical interaction between the contractors working for the CIO and IRM technical staff. Also, management must focus on assessing the need for implementing software that has been purchased if it is still viable to the FLRA systems. If this software is inappropriate, then after the CIO risk assessment, the new purchase of required software and its implementation should become a priority.

Over this next year, the FLRA must focus and improve its computer technology and information security, create an agency wide POA&M which relates to a mission and/or support FLRA functions. Policies and training need to be conducted and senior management needs to assess the extent of FLRA's ability and need to comply with e-government requirements.

OMB has specifically identified FISMA reporting requirements for agencies and Inspectors General. I am attaching the Inspector General review for inclusion in the Agency submission. I have also provided a copy of Inspector General defined vulnerabilities from the 2001 Security Audit and their current status.

Audit of Computer Information			1 a. Fund, develop, implemen t an informati on security
			9/30/2002
			Open
<u>Security</u> <u>February 2001</u>	program that complies with OMB Circulars A-123, Revised	date to	A-127,
		and A-130.	
		be deteri	nined
	1 b. Establish senior management oversight		
			9/30/20/02
	committee to Demonstrate senior management's commitment to and Support of an effective, efficient security program.	1/2002	Closed
	1.c. Ensure procedures are established to monitor/report		9/30/02
			Closed
	FLRA's progress in resolving weaknesses and developing an efficient/effective information system security system.		Closed
	2 a. Establish a security awareness program that all		2/30/02
			Open
	employees must attend annually.	date to be determined	Revised
	2b. Delegate authority to IRMD that clearly assigns		9/30/2002
	responsibilities and requirements; coordinate information Security control with systems outside IRMD and assist/control with other Program offices during development and implementation if new systems and enhancements to existing systems.	Revised date to be determined	Open
	2.c. Revise current instructions for HRD		
			9/30/2002
	and BFD to include security administration responsibilities for respective systems & require coordination with IRMD.	Revised of the determination o	
			2d. Ensure that

Ensure that system owners and program offices

9/30/2002

Open

perform periodic risk and vulnerability assessments

Revised date to

and certify systems.

be determined.

2e. Develop & establish agency-wide information

9/30/2002

security policy through the consolidation of existing instructions.

Open Revised date to

be determined.

2f. Centralize management responsibilities

9/30/2002

Closed

for development of security policy procedures and practices, but retain daily security administration with program offices.

2g. Develop procedures to maintain a

9/30//2002

Open current inventory of authorized users for each system and for remote access.

determined

2h. Define rules of behavior for each system
based in management's defined level of
acceptable risk.

9/30/2002 Open
Revised date to be

determined

2i. Develop procedures to ensure that security 9/30/2002

Open
Officials, systems, and data owners establish
and formalize procedures for granting
appropriate access and system privileges.

2j. Conduct an agency-wide assessment

9/30/2002

Closed

Of information contained within the various systems to identify/classify the sensitivity of information and the security level needed.

2k. Formalize incident response procedures and 9/30/2002 Open Revised date to processes to identify/report on apparent/actual security breaches. Include instructions on be determined proper procedures for reacting to security breaches in security awareness program. 21. Develop procedures for periodically evaluating 12/30/200 Open User privileges and in granting initial access and Revised date to privileges to systems software and data. be determined 2m. Obtain new remote access software sufficient 3/31/02 Open to preclude unlimited remote dial in access to Revised to 09/30/2002 FLRA network. 3/31/2002 2n. Obtain new software to monitor eternal access Closed to the network and alert IRMD security Personnel of suspicious activities. 20. Dedicate funding to identify, review, and evaluate 4/30/03 Open critical business functions for developing a business Revised date to contingency and recovery plan. determined 3a. Document procedures for programmers' 12/30/01 Open Revised to access to the production environment and 12/31/2002 management's compensating controls to Revised target date to detect unauthorized activities. be determined 3b. Document the network configuration: 4/30/03 Open Revised to 6/30/2003 hardware4, software, and security controls; client server and Oracle databases; and systems security controls. 3c. Develop a System Develop Life Cycle 4/30/2003 Open

Methodology compliant with OMB and NIST Revised date to Be determined

requirements for developing new systems and enhancing existing systems

4a. Review costs and benefits of relocating

Closed computer used for Entering and authorizing

9/30/2002

vendor payments to the Department of Treasury to a more secure location away from the General work area into an area of

	General work area into an area of		
	limited access.		
Audit of Computer Information			1 a. Fund, develop, implemen t an informati on security
			9/30/2002
			Open
Security Enhancem 2001		program complies with OM A-123, Revised	B Circulars date to
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	FLRA's progress in resolving weaknesses and developing an efficient/effective information system security system.		Closed
	2 a. Establish a security awareness program that all		2/30/02
	employees must attend annually.	date to be determined	Open Revised
	2b. Delegate authority to IRMD that clearly assigns		9/30/2002
	responsibilities and requirements; coordinate information Security control with systems outside IRMD and assist/control with other Program offices during development and implementation if new systems and enhancements to existing systems. 2.c. Revise current instructions for HRD	Revised date to be determined	Open
			9/30/2002
	and BFD to include security administration responsibilities for respective systems & require coordination with IRMD.	O _I Revised date be determine	
	2d. Ensure that system owners and program offices		9/30/2002
	perform periodic risk and vulnerability assessments	Revised date to	Open
	and certify systems.	be deter	mined.

2e. Develop & establish agency-wide information

security policy through the consolidation of existing instructions.

Open Revised date to

be determined.

2f. Centralize management responsibilities

9/30/2002

Closed

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2g. Develop procedures to maintain a

9/30//2002

current inventory of authorized users for each system and for remote access.

Open Revised date to be

determined

2h. Define rules of behavior for each system based in management's defined level of acceptable risk.

9/30/2002 Open Revised date to be

determined

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9/30/2002

Officials, systems, and data owners establish and formalize procedures for granting appropriate access and system privileges.

Open Revised date to be determined

2j. Conduct an agency-wide assessment

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Of information contained within the various systems to identify/classify the sensitivity of information and the security level needed.

2k. Formalize incident response procedures and

9/30/2002

Open

processes to identify/report on apparent/actual security breaches. Include instructions on proper procedures for reacting to security breaches in security awareness program.

Revised date to be determined

21. Develop procedures for periodically evaluating

12/30/200

2

Open

User privileges and in granting initial access and privileges to systems software and data.

Revised date to be determined

2m. Obtain new remote access software sufficient

3/31/02

Open

to preclude unlimited remote dial in access to FLRA network.

Revised to 09/30/2002

to be determined

2n. Obtain new software to monitor eternal

3/31/2002

9/2001Clo

sed

to the network and alert IRMD security Personnel of suspicious activities.

20. Dedicate funding to identify, review, and evaluate

4/30/03

critical business functions for developing a business contingency and recovery plan.

Revised date to

Open be

determined

3a. Document procedures for programmers'

12/30/01

Open

be

access to the production environment and Revised to

12/31/2002

management's compensating controls to Revised target date

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detect unauthorized activities.

3b. Document the network configuration:

4/30/03

Open Revised to 6/30/2003

hardware4, software, and security controls; client server and Oracle databases; and systems security controls.

> 3c. Develop a System Develop Life Cycle

4/30/2003

Open Methodology compliant with OMB and NIST

Revised date to

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3/17/2003

Be determined

vendor payments to the Department of Treasury to a more secure location away from the

General work area into an area of

limited access.

Internal Review of the Office of the General Counsel's

3. To acknowledge and comply with

10/02

3/02

Closed

information security and assurance, case files should be marked with "For Official Use Only" or "Confidential" and be locked after hours and during major time absences of investigation agents to protect confidentiality/sensitivity of information.

6. Refrain from using e-mail to

transmit any type of investigation

documentation. Until software is

possibility of information disclosure/compromise.

9/02

encrypted or other appropriate information Security software is installed unless parties are aware of potential disclosure and agree to use the e-mail even though there is the

Open Awaiting decision of new **General Counsel**

A.1.Identify the agency's total IT security sp agency's FY03 budget enacted. This shown assets. Do not include funding for critical the public.	uld critical inf	rastructure pro	otection cos	ts that apply	to the protection of	of government operations and	
Bureau Name				FΥ	/03 IT Security S	pending (\$ in thousands)	
Agency Total							
A.2a. Identify the total number of program officials and CIOs in FY03, the total numbe in FY03. Additionally, Igs shall also identify FY03.	r of contracto	or operations o	r facilities, a	and the numb	er of contractor op	perations or facilities reviewed	
Bureau Name	FY 03 Pro	grams	FY03	S Systems	FY 03 Contrac	tor Operations or Facilities	
Office of the Inspector General Federal Labor Relations Authority	Total Number	Number Reviewed	Total Number Number Reviewed		Total Number	Number Reviewed	
Programs	6	6 8			2	0	
	OSHA Compliance Case Processing Human Capital Fair Act Compliance FISMA Compliance Financial Reports, Central Services Fund and Budget Formulations				These will be reviewed in detail during to 2004 audit.		
Agency Total	6		8		2		
b. For operations and assets under their control, have agency program officials and the agency CIO used appropriate methods (e.g., audits or inspections) to ensure that contractor provided services or services provided by another agency for their program and systems are adequately secure and meet the requirements of FISMA, OMB policy and NIST guidelines, national security policy and agency policy?	a compreh computer i security au and is curr process of out a comp Security Process of during FY audit will a compliance OMB and I rquirermen national security por The FLRA was estably year and ir	nformation dit in FY 2001 ently in the contracting brehensive rogram audit be completed 2004. This ddress FLRA e with FISMA, NIST hts as well as ecurity and licy. CIO position lished this pas hitially focused g information	t				

	planning and policy formulation. The CIO had two contracted technical assistants working with her to create Agency security information technology policies and plans which would comply with NIST guidelines, OMB policy and FEDCirc. No formal CIO assessments of contractor information has yet been performed, The FLRA CIO relies significantly on the contractors input which is based on NIST guidelines		
c. If yes, what methods are used? If no, please explain why.			
d. Did the agency use the NIST self-assessment guide to conduct its reviews?	NIST self assessments were performed in FY 01 and FY 02. As of August 1, 2003, no NIST assessment has yet been conducted this year.		
e. If the agency did not use the NIST self-assessment guide and instead used an agency developed methodology, please confirm that all elements of the NIST guide were addressed in the agency methodology.	N/A	N/A	

A.3. Identify all material weaknesses in policies, procedures, or practices as identified and required to be reported under existing law in FY03. Identify the number of material weaknesses repeated from FY 02, describe each material weakness, and indicate whether POA&Ms have been developed for all material weaknesses.

	FY 03 Material Weal	rnesses			
Bureau Name	Total Number	Total Number Repeated from FY02	Identify and Describe Each Material Weakness	POA&Ms developed? Y/N	
weaknesses have been identified. security vulnerabe were identified by 2001 IG Audit. August 1, 2003, been corrected a been closed. (Co		48 computer information security vulnerabilities were identified by the FY 2001 IG Audit. As of August 1, 2003, 14 had been corrected and have been closed. (Corrective actions are attached)		A corrective action plan was created in FY 2001 related to the significant vulnerabilities identified by a previous IG Computer Information security audit. Management is addressing these vulnerabilities. An Agency wide POA&M has not yet been issued but is being worked upon by the CIO.	
Agency Total	0	0		0	

Agency rotal	U	U			U
A.4. This question is for Igs only. For developed, implemented, and is may and milestone process that meets to please include additional explanation.	anaging an agency-wide he criteria below. Whe	Yes	No		
Agency program officials develop, every system that they own and op programs) that has an IT security v	erated (systems that su		owned and operated formulated. The tender of evolving all Agency 2000. The Agency needs and systems create an agency will and define related p	A&M relating to all systems drare in the process of being chnology staff is in the process by systems into Windows must define its technology (according to functions,) de POA&M for each system erformance metrics so that it to budget formulation.	
Agency program officials report to a quarterly) on their remediation prog			officials on an annua are developed and are defined, these m FLRA program offici standardized informa	neeting with Agency program al basis. Once the POA&Ms the remediation requirements neetings should increase. als have not received ation technology training and of evaluation of information	
Agency CIO develops, implements, and manages POA&Ms for every system that they own and operate (systems that support their programs) that has an IT security weakness.				POA&Ms for each s formulated.	ystem are currently being
The agency CIO centrally tracks an least a quarterly basis.	d maintains all POA&M	activities on at		Explanation same a	s above.
The POA&M is the authoritative agency and IG management tool to identify and monitor agency actions for correcting information and IT security weaknesses.				therefore the IG doe tool. However, con the CIO and Informa Division staff on a co	process of being developed, s not have this management tinuing discussions by IG with tion Resource Management ontinuous basis keep the IG ions and security weaknesses
System-level POA&Ms are tied direct through the IT business cases as re(Circular A-11) to tie the justification process.	equired in OMB budget		Identified critical need internal budget form approved by the Chabeen aware of some	process of being developed. eds are currently tied to ulation and need to be airman. Management has e computer systems' nasn't been able to address	

A.4. This question is for Igs only. Please assess whether the agency has developed, implemented, and is managing an agency-wide plan of action and milestone process that meets the criteria below. Where appropriate, please include additional explanation in the column next to each criteria.	Yes	No
Agency IGs are an integral part of the POA&M process and have access to agency POA&Ms.		them all because of its small staff and funding restrictions. POA&Ms are currently being developed. The FLRA IG has been kept informed of information security developments by the CIO.
The agency's POA&M process represents a prioritization of agency IT security weaknesses that ensures that significant IT security weaknesses are addressed in a timely manner and receive, where necessary, appropriate resources		The CIO is currently identifying and proposing corrective actions for critical security weaknesses. The FLRA has implemented a state of the art firewall, has identified needed security devices, is working with OMB and implementing security devices identified by CISCO. The Agency is also beginning to integrate its information security with physical security and has continuing interaction with the Agency's Security Officer.

B. Responsibilities of Agency Head

In this section, the agency must respond to performance measures and may provide narrative responses where appropriate to the following questions:

B.1. Identify and describe any specific steps taken by the agency and unambiguously set forth FISMA's responsibilities and author agency CIO and program officials. Specifically how are such stimplemented and enforced?	The Chairman, FLRA created a Chief Information Officer position during this past fiscal year. The CIO was directed to create information security policy and planning in compliance with Federal requirements as well as define FLRA technical requirements, and review and clean up the existing systems. The latter has been completed. The Chairman, FLRA has also assigned the CIO the responsibility to perform a risk assessment on the Agency's systems which is currently in progress. The Chairman has also directed the formulation of an action plan which will comply with FISMA requirements. Also the Chairman has placed a priority on security training for FLRA officials and managers as well as personnel.				
B.2 Can a major operating component of the agency make an IT decision without review by and concurrence of the agency CIO?		No, the C	hairman must app	prove the decision.	
B.3. How does the head of the agency ensure that the agency's security plan is practiced throughout the life cycle of each agen	currently assessment POA&M is the creation	being implemente ent are completed s established, the	s to Windows 2000 is d. Once this and the risk and an Agency wide Agency Head will address ation of a life cycle security e Agency.		
B.4. During the reporting period, did the agency head take any direct actions to oversee the performance of 1) agency program the CIO to verify that such officials are ensuring that security plaup-to-date and practiced throughout the lifecycle of each system	The Chairman has not yet taken specific and/or direct actions to oversee the performance of agency officials since the current security focus is to re-implement FLRA security programs that focus on contemporary needs and requirements. The FLRA CIO is meeting annually with program managers and will be responsible for reporting information security compliance of the Agency's program managers when the lifecycle POA&M for all systems is implemented.				
B.5. Has the agency integrated its information and information security program with its critical infrastructure protection respo other security programs (e.g., continuity of operations, and physoperational security)?	The FLRA is currently in the process of integrating its information and information technology security program with its other security programs. The FLRA Inspector General will be conducting an audit this fall on this very subject. The FLRA has not yet created a Continuity of Operations because it must first implement proper operations, but the Chairman is aware of its importance.				
B.6. Does the agency have separate staffs devoted to other secunder the authority of different agency officials, if so what speci been taken by the agency head or other officials to eliminate unduplication of overhead costs and ensure that policies and proconsistent and complimentary across the various programs and	The FLRA has separate security and computer security information staffs who are under the authority of different agency officials who report to the Chairman.				
B.7. Identification of agency's critical operations and assets (both interdependencies and interrelationships of those operations and assets)		operations	and assets and	mission critical) and the	
a. Has the agency fully identified its critical operations and assets, including their interdependencies and interrelationships?	Yes The FLRA has it its critical opera security is one to interrelates to all operations, progrand resources	tions and hat II	No		
b. If yes, describe the steps the agency has taken as a result of the review.	The Chairman h directed the Age to perform a risk assessment of t computer inform systems. The I Inspector Gener	ency CIO c he nation FLRA			

	to commence an audit of all FLRA security programs during FY 2004.				
If no, explain why					
B.8. How does the agency head ensure that the agency, incluse security incidents and sharing information regarding common visions.	uding all components, has documented procedures for reporting ulnerabilities?				
a. Identify and describe the procedures for external reporting to law enforcement authorities and to the Federal Computer Incident Response Center (FedCIRC).	Procedures currently exist for reporting physical security incidents. The CIO will draft policy and procedures for reporting computer information security incidents in the near future.				
b. Total number of agency components or bureaus.	8				
c. Number of agency components with incident handling and response capability.	8 Physical security				
d. Number of agency components that report to FedCIRC.	1				
e. Does the agency and its major components share incident information with FedCIRC in a timely manner consistent with FedCIRC and OMB guidance?	No serious information security incident has occurred.				
f. What is the required average time to report to the agency and FedCIRC following an incident?	FLRA policy has not yet ben established. The IG would recommend immediate reporting as soon as possible, and definitely not beyond 8 hours of the incident				
g. How does the agency, including the programs within the major components, confirm that patches have been tested and installed in a timely manner?	Policy needs to be developed for program installations and related testing to ensure security . Currently, the FLRA has no testing capability.				
h. Is the agency a member of the Patch Authentication and Distribution Capability operated by FedCIRC?	Currently, one Information Resource Management technical team leader has applied for Agency membership				
i. If yes, how many active users does the agency have for this service?	2 (CIO and IRM)				
j. Has the agency developed and complied with specific configuration requirements that meet their own needs?	The FLRA is currently assessing its configuration needs.				
k. Do these configuration requirements address patching of security vulnerabilities?	Yes				

B.9 Identify by bureau, the number of incidents (e.g., successful and unsuccessful network penetrations, root or user account compromises, denial of service attacks, website defacing attacks, malicious code and virus, probes and scans, password access) reported and those reported to FedCIRC or law enforcement.								
Bureau Name	Number of incidents reported Number of incidents reported externally to Fedor law enforcement							
		No incidents reported externally to FEDCIRC or law enforcement.						

C. Responsibility of Agency Program Officials and Agency Chief Information Officers

In this section, the agency must respond to performance measures and may provide narrative responses where appropriate to identify and describe the performance of agency program officials and the agency CIO in fulfilling their IT security responsibilities.

C.1. Have agency program officials and the agency CIO: 1) assessed the risk to operations and assets under their control; 2) determined the level of security appropriate to protect such operations and assets; 3) maintained an up-to-date security plan (that is practiced throughout the life cycle) for each systems supporting the operations and assets under their control; and 4) tested and evaluated security controls and techniques? By each major agency component and aggregated into an agency total, identify actual performance in FY 03 according to the measures and in the format provided below for the number and percentage of total systems.

		syste asses risk a assig	ssed for	Number systems have an up-to-da security	that te IT	systems certified and accredited controls costs integrat into the cycle of		Number of Systems w/security controls costs integrated into the life cycle of the system Systems Number of systems for which security controls have been tested and evaluated in the last year		Number of systems w/a contingency plan					
Bureau Name	Total Number of Systems	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
	275 (approx.)						<u> </u>								
		0- no devel yet.		0		0		0		* 0		0		0	
Agency Total															

^{*} Will be performed by FY2004 Audit

C.2. Identify whether the agency CIO has adequately maintained an agency-wide IT security program and ensured the effective implementation of the program and evaluated the performance of major agency components.								
Has the agency CIO maintained an agency-wide IT security program? Y/N	Did the CIO evaluate the performance of all agency bureaus/components? Y/N	How does the agency CIO ensure that bureaus comply with the agency-wide IT security program?	Has the agency CIO appointed a senior agency information security officer per the requirements in FISMA?	Do agency POA&Ms account for all known agency security weaknesses including all components?				
N Not yet implemented		IT security programs not yet implemented.	No	Programs not yet created.				

C.3. Has the agency significant IT security r			aining and awareness of	all agency e	employees, i	ncluding contractors an	d those employees with
Total number fo agency employees in FY 03	Agency employees that received IT training in FY 03		Total Number of agency employees w/significant IT security responsibilities	Agency employees w/significant security responsibilities that received specialized training		Briefly describe training provided	Total costs for providing training in FY03
	No.	%		No.	%		
			No specific training was provided by the CIO during FY 2003.				

C.4. Has the agency CIO fully integrated security into the agency's capital planning and investment control process? Were IT security requirements and costs reported on every FY05 business case (as well as in exhibit 53) submitted by the agency to OMB?								
Bureau Name	Number of business cases submitted to OMB in FY05	Did the agency program official plan and budget for IT security into all of their business cases? Y/N	Did the agency CIO plan and budget for IT security and integrate security into all of their business cases? Y/N	Are IT security costs reported in the agency's exhibit 53 for each IT investment? Y/N				
	This information was not available at the time of the evaluation.							