MEMORANDUM

DATE: July 19, 2017

TO: Managing Director

FROM: Inspector General

SUBJECT: Final Report on the Website Security Assessment Follow-up
(Evaluation Report No.16-EVAL-09-06)

The Office of Inspector General (OIG) is providing the final report on the contracted follow-up assessment of the Federal Communications Commission's (FCC) corrective actions to address recommendations reported in the OIG Website and Infrastructure Security Assessment Report, dated April 24, 2013 (Report No. 12-EVAL-12-18). The OIG engaged the independent certified public accounting firm of Kearney and Company, P.C. (Kearney) to perform the follow-up assessment.

This assessment was performed consistent with the OIG's authority under the Inspector General Act of 1978, as amended, including, but not limited to sections 2(1) and 4(a)(1) and was conducted in accordance with the Council of Inspector General on Integrity and Efficiency (CIGIE) Quality Standards for Inspection and Evaluation. The evaluation was not intended as a substitute for any agency regulatory compliance review or audit.

The objective of the follow-up evaluation was to assess the effectiveness of FCC's corrective actions completed to remediate the 37 recommendations made in the 2013 assessment report (Report No.12-EVAL-12-18). Kearney also evaluated the effectiveness of the current controls over the FCC's website environment and whether the FCC was in compliance with applicable FCC website related directives, policies, and procedures; and National Institute of Standards and Technology (NIST) guidance regarding website management and security, including security in public cloud computing.

Kearney concluded that the Commission had not fully implemented corrective actions in response to the 2013 assessment and did not comply with FCC policy and NIST guidance.

1 INSPECTOR GENERAL ACT OF 1978, AS AMENDED, §2. Purpose and establishment of Offices of Inspector General ... (1) to conduct and supervise audits and investigations relating to the programs and operations of the establishments. §4. Duties and responsibilities; (a) It shall be the duty and responsibility of each Inspector General ... (1) to provide policy direction for and to conduct, supervise, and coordinate audits and investigations relating to the programs and operations of such establishment.
on information security related to the website upgrade of FCC.gov and its ongoing operations. The Kearney follow up assessment report presents 6 findings and 17 recommendations. The 17 recommendations are a combination of updated and newly recommended actions to improve the security posture of the FCC.gov public website.

Kearney is only responsible for the attached auditor's report and the conclusions expressed therein. The OIG monitored Kearney's performance of the contract and attended interviews Kearney conducted as part of its assessment. Also, the OIG regularly met with Kearney to discuss the audit status, and reviewed Kearney's report and related documentation. Our review disclosed no instances where Kearney did not comply in all material respects with CIGIE Quality Standards for Inspection and Evaluation.

The OIG would like to thank FCC management for their assistance and cooperation during this assessment. We have reviewed your response to the draft report in which you stated that the FCC will evaluate the recommendations and work to remediate them as soon as possible. We have attached management's response, in its entirety, in Appendix C of the report. We look forward to working with you to close the remaining recommendations.

Due to the sensitive nature of the information contained in this report, it has been marked "Non-Public, For Internal Use Only." This report has a limited distribution and those persons receiving it are requested not to photocopy or otherwise distribute it unless authorized by the OIG.

If you have questions, please contact me, Robert McGriff, Assistant Inspector General for Audit at (202) 418-0483 or Sophila Jones, Deputy Assistant Inspector General for Audit at (202) 418-1655.

Attachment

cc:  Chief Information Officer
     Chief Information Security Officer