MEMORANDUM

TO: THE COMMISSION

We hereby submit Audit Report No. OIG-AR-04-05, *Evaluation of the U.S. International Trade Commission’s Fiscal Year 2005 Information Security Program and Practices*. We conducted an independent evaluation of the Commission’s information security program and practices to determine if the Commission: (1) implemented appropriate actions to address recommendations made in OIG-AR-01-05 (October 6, 2004); and (2) met Federal Information Security Management Act criteria.

The Commission made limited progress in strengthening its information technology (IT) security program during the 2005 fiscal year (FY). The most commendable accomplishments include:

- Completing a certification and accreditation package for the Data Web Cluster;
- Performing audits on several systems to evaluate security;
- Separating operational duties from the duties of the system administrator of the travel management system; and
- Eliminating the employee’s Social Security number as the required user identification for a major application.

The Commission must however take significant further action in order to achieve consistency with U.S. Office of Management and Budget (OMB) Circular A-130, Appendix III *Security of Federal Automated Information Resources* (February, 1996). While the security process is a continuous cycle of evaluating, improving, and monitoring controls of the major IT systems, the Commission had not completed many basic steps towards achieving security over its systems. The OIG identified weaknesses in these areas as early as 2001, but the Commission has been slow in fully implementing the recommendations. Specifically, the Chief Information Officer (CIO) needs to define
business continuity and disaster recovery controls; strengthen security planning and program management; enhance access controls; enhance segregation of duty controls; enhance system software controls; enhance change controls; and strengthen controls over background investigations.

We made 23 recommendations to improve the Commission’s IT security. In addition to the 9 open recommendations from OIG-AR-01-05 (October 6, 2004), this report makes 14 new recommendations. The Commission concurred with our findings and recommendations.

We appreciate the courtesies and cooperation provided to our auditors during this audit.

Kenneth F. Clarke
Inspector General

CC: Office Directors
Cotton & Company LLP