USDA

U.S. Department of Agriculture

Office of Inspector General
Midwest Region

Audit Report

Review of Application Controls
for the Import Tracking System

March 31, 2005

REPLY TO
ATTN OF: 33501-0001-Ch

TO: Dr. W. Ron DeHaven
           Administrator
           Animal and Plant Health Inspection Service

ATTN: William J. Hudnell
           Deputy Administrator
           Marketing and Regulatory Programs – Business Services

FROM**:**   Robert W. Young   /S/
           Assistant Inspector General
              for Audit

This report presents the results of our audit of the Application Controls for the Import Tracking System. Your agency's response to the draft report, dated March 7, 2005, is included in its entirety as exhibit A, with excerpts and the Office of Inspector General's position incorporated into the relevant sections of the report.

We agree with your management decisions for Recommendations Nos. 1, 2, 3, and 4. Please follow your agency's internal procedures in forwarding final action correspondence to the Office of the Chief Financial Officer.

Management decision has not been reached for Recommendation No. 5. The Findings and Recommendations section of the report includes a description of the information needed to reach a management decision for this recommendation.

In accordance with Departmental Regulation 1720-1, please furnish a reply within 60 days describing the corrective action taken or planned and the timeframes for implementing this recommendation. Please note that the regulation requires a management decision to be reached on all findings and recommendations within a maximum of 6 months from report issuance, and final action to be taken within 1 year of each management decision.

We appreciate the courtesies and cooperation extended to us by your staff.

Executive Summary
Review of Application Controls for the Import Tracking System

Results in Brief

We performed this audit to determine if the Animal Plant Health Inspection Service (APHIS) had adequate application controls over the Import Tracking System (the system). The system is used to record, verify, and report animals, and live animal products, entering the country at border ports. This includes documenting that animals had been inspected, providing data to the Agricultural Marketing Service, and providing import origination and destination information if the need arises.

We found that APHIS had not prescribed internal controls to provide reasonable assurance that data input was accurate and timely. One of the primary automated application controls (programmed in the system) was a completeness check, but this was used only for some of the critical fields on the input form. Look-up tables were also in place for some critical fields to reduce the potential for errors during the input process. The agency had not, however, implemented compensating manual controls, such as second party or supervisory reviews, to detect input errors before transmission to the system when automated controls were lacking. The agency had not distributed system user manuals to all port offices, and had not provided formal training on the system to all staff.

The lack of sufficient application controls resulted in errors occurring during the inputting of data into the system. For example, we identified 27 instances, of 834 reviewed at the 5 port offices we visited, where the number of animals entering the country in a shipment, as listed on the input document, was different than the number in the system. In 16 instances, the number of animals in those shipments was entered as zero when the actual number of animals entering the country, per the input document, ranged from 2 to 464. In another instance, a port office significantly overstated the number of animals crossing the border by erroneously inputting a shipment of 50,000 units of bovine sperm into the system as 50,000 live animals.

Another error was an inaccurate destination for animals in shipments entering the country. The agency performed an analysis of approximately 812,000 records that identified over 2,600 instances where the importer's location was listed as unknown, and over 600 instances where the destination was not listed in the system. While the agency plans to correct these errors, the lack of sufficient controls makes it highly likely that errors will continue to occur in the future.

The agency also had no requirements for the frequency of transmitting data into the system, and it did not monitor port office transmission activities. Thus, the system lacked up-to-date and therefore accurate information

because port offices were not always transmitting data in a timely manner. In one instance, a port office had not transmitted data into the system for over a year. The failure was discovered only after agency officials created a report from the system that indicated import activity was understated. Another port office had not transmitted data for over a month because of a telecommunication problem.

Agency officials were reluctant to implement additional application controls because they estimated the system's error rate at 1 percent. However, they were unable to provide evidence to support this estimate. Based on our assessment that controls were weak and the errors we identified, we concluded that the system could not provide timely and accurate information on animal import activity. APHIS' Import Tracking System Application Security Plan, however, rates the security objective "Integrity" as high risk. The plan states, in part, "If the data in the system were inaccurate, incomplete, or falsified it could provide a threat to APHIS and its stakeholders and could cause a grave threat to APHIS' ability to protect American Agriculture and import/export markets." To improve the system's reliability, the agency needs to implement manual controls, automated edit checks such as range and crosscheck tests, and requirements for transmitting data.

Access controls also needed improvement. We observed employees at two of the five port offices we visited who were improperly using former employee passwords and user identifications to access the system. At two other port offices, we observed that employees were openly displaying their user identifications and passwords. The agency had inadequate procedures to remove users from the system when they transferred or left the agency. The agency was also not maintaining employee access lists, or monitoring employee actions to safeguard passwords and user identifications.

Recommendations In Brief

We recommend that APHIS establish manual and automated application controls for the system, distribute system user manuals to port offices, and provide training on the system to port office personnel. We also recommend that the agency develop and implement minimum frequency requirements for transmitting data to the system, and monitor port office data transmission activities. Finally, we recommend that the agency develop procedures for deleting user access to the system.

Agency Response

In its response dated March 7, 2005, APHIS agreed with all the recommendations in the report. We have incorporated applicable portions of APHIS' response, along with our position, in the Findings and Recommendations section of the report. The agency's response is included in its entirety as exhibit A of the report.

OIG Position   We agree with APHIS' proposed corrective actions and have reached management decision on all but Recommendation No. 5. In order to reach a management decision for Recommendation No. 5, APHIS needs to implement a system where user identifications in the system are periodically compared to current employees.

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Background and Objectives

Background

Information security, improving the overall management of information technology resources, and the transition to electronic business (e-government) have emerged as top priorities within the U.S. Department of Agriculture (USDA). As technology has enhanced the ability to share information instantaneously among computers and networks, it has also made organizations more vulnerable to unlawful and destructive penetration and disruptions. In addition to general controls of the operating system, individual applications also require specific controls.

Application controls are the structure, policies, and procedures that apply to separate, individual application systems. They can encompass both the routines contained within the computer program code, and the policies and procedures associated with user activities, such as manual measures performed by a user to determine that data was processed accurately by the computer. Application controls help make certain that transactions are valid, properly authorized, and completely and accurately processed by the computer. Controls are commonly categorized into three phases:

- **Input**—data are authorized, converted to an automated form, and entered into the application in an accurate, complete, and timely manner.

- **Processing**—data are properly processed by the computer and files are updated correctly.

- **Output**—files and reports generated by the application actually occur and accurately reflect the results of processing, and reports are controlled and distributed to the authorized users.

APHIS' mission is an integral part of USDA's efforts to provide safe and affordable food through the protection of the nation's animal and plant resources from agricultural pests and diseases. One of APHIS' six operational program units, Veterinary Services, accomplishes this through monitoring and promoting animal health and productivity, and preventing, ontrolling, and eliminating animal diseases. APHIS currently has 38 full-time ports and 26 limited ports for the importation of animals. Using the Import Tracking System (the system), the Veterinary Services unit documents information on all animals and animal products crossing the border into the United States and entering at other designated port locations. The information is entered into the system through a two-page release form. The first page includes importer and destination information. The second page lists the number and type of animals released, unit of measure, species, breed, sex, purpose, number rejected, and any other information that would physically identify the animals.

The data gathered at each designated port are then transmitted to a national database in Fort Collins, CO. This database contains information for identifying animal import information. The agency generally needs information about a particular animal of special interest, an animal's purpose, or its destination State. The Agricultural Marketing Service also uses system information in its efforts to improve marketing of animals. Application controls are necessary to ensure that the system data are accurate and complete.

Objectives

Our objective was to determine whether the system's application controls were in place and functioning effectively to ensure transactions were properly authorized, and completely and accurately processed.

Formal policies and procedures, to include control measures, had not been prescribed for the Import Tracking System (the system). As a result, we found that the data's accuracy could be improved and the timeliness of the input significantly enhanced. Thus, the system cannot be relied upon as a timely and accurate source of information for animal import activity.

The Federal Information Processing Standards Publication 73 requires that data be validated continuously as new data are generated or used during processing. The validation of data involves an examination for accuracy, completeness, consistency, and reasonableness. Departmental regulations[1] also require agencies to ensure the validity of data when designing and implementing applications.

Finding 1   Lack of Application Controls Resulted in Input Errors

We identified errors in system data. APHIS and Agricultural Marketing Service (AMS) officials had also detected errors in system data. (AMS is an external user of system data.) The types of errors in the system included the input of incorrect numbers of animals in shipments entering the country, incorrect purpose codes for animal's entering the country, and no destination States for animals. We attributed the system errors primarily to a lack of prescribed application controls, both automated and manual. A lack of formal guidance and training for port office employees also contributed to the errors we found.

We identified errors by comparing system data to input documents at five port offices. For example, we found 27 instances from 834 records reviewed, where the number of animals was incorrectly input in the system. This included 16 instances where the number of animals in shipments entering the country was input as zero. However, the number of animals listed on the 16 input documents actually ranged from 2 to 464. We also found eight instances where the purpose of an animal's entry into the country, as listed in the system, differed from the input document at the port office.

Agency officials also identified errors in the system. In an analysis performed at the time of our audit, they identified 614 instances from calendar years 2002 to 2004 where the system did not identify the destination

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[1] DM 3140-1.3 "Management ADP Security Manual," section 17 (1) (4). "Application System Development," dated July 19, 1984.

State for animal shipments. In 2,607 instances from over 812,000 records, the importer's State was listed as unknown. Agency officials also identified an instance where a port office significantly overstated the number of animals crossing the border by erroneously inputting a shipment of 50,000 units of bovine sperm into the system as 50,000 live animals.

The errors we found could have been prevented or detected when data was input into the system if sufficient application controls were in place and functioning properly. For example, there were no manual controls in place, such as supervisory or second party reviews, to verify the accuracy of data prior to being input into the system. Further, there was no reconciliation of source document data input at the port office to system records.

The system also lacked fully adequate automated application controls. The system data entry form (release form) had built-in completion requirements for some, but not all, fields. "Destination State" is an instance where the field was left blank. In addition, look-up tables were provided on the data input form for only some fields. However, we identified, and agency officials were also aware of, many records where fields for species, breed, purpose, and destination were listed as "other," "unknown," or "not specified." These options should be eliminated or clarified further in a second field, to ensure more accurate information in the system.

Other data field validation controls should also be built into the system to prevent the errors found during our review. For example, if the system included a range test, which compares the input number to a range of acceptable numbers, the 50,000 bovine sperm error described earlier could have been identified during the input process. Another control that could improve the system is a crosscheck between data fields. This test would determine the reasonableness of data entered into one field based on data from another field. For example, a crosscheck could be developed that would not allow the input of a record listing the sex of an animal as "castrated male" in one field when the purpose of the animal's entry into the country is listed in another field as "breeding." These are just two application controls that check for consistency and reasonableness of data.

Agency officials informed us that they had performed their own review of the system, which had identified many of the issues described in this finding. However, they stated that no action had been taken to implement new procedures for several reasons. First, they did not consider the system to be a major application. Therefore, they devoted their limited information technology resources to other systems. Second, the officials estimated the system's error rate to be less than 1 percent. Lastly, they stated that additional controls would slow down the system at port offices.

We disagree with each of these points. The system was initially listed with the Office of the Chief Information Officer as a mission critical application

and, thus, resources should be used to protect the reliability of system data. Further, APHIS' "Import Tracking System Security Plan" contradicts these assertions. For example, the security objective "Confidentiality" is rated as high risk and states, in part, "If disclosed to unauthorized persons, data handled by the system (trade data) would likely be a threat to our ability to protect American food supplies and/or support Agriculture and export/import markets, and could cause grave embarrassment for APHIS, its business partners, and stakeholders, with a reasonable expectation of outside investigation, official censure, and/or dismissal of senior managers."

The security objective "Integrity" is also rated high risk and states, in part: "If the data in the system were inaccurate, incomplete, or falsified it could provide a threat to APHIS and stakeholders and could cause a grave threat to APHIS' ability to protect American Agriculture and import/export markets." Finally, agency officials provided no evidence to support their statements of a 1 percent error rate, nor its contention that the system would be measurably slowed. Consequently, based on the types and frequency of errors found during our review, we concluded that additional controls are needed to ensure data integrity in the system.

During our review, agency officials assigned a veterinarian to work with port office staff to resolve errors found in the system. In addition, the agency is in the process of hiring a consultant to perform trend analyses of the system to identify errors. In our opinion, these monitoring actions could be reduced with adequate application controls to prevent errors in the system.

Two other reasons for errors are a lack of user manuals at port offices and insufficient training of port office staff. At four of the five port offices we visited, there were no official system user manuals. Without user manuals, errors are likely because employees may use incorrect procedures to input data rather than following specific rules. Further, most port office employees had not received training on the system. Again, employees may be using the wrong procedures and inputting incorrect data into the system.

Recommendation No. 1

Establish manual and automated application controls for the system.

Agency Response

There are insufficient personnel at most port locations to provide second party or supervisory reviews. Therefore, data reviewed by Center for Epidemiology and Animal Health (CEAH) staff and the automated scanning process is intended to assist in identifying errors. However, APHIS will incorporate controls, such as cross-validation, into the VSPS system by April 30, 2005.

OIG Position

We accept APHIS' management decision for this recommendation.

Recommendation No. 2

Provide user manuals and training to all port offices and appropriate employees.

Agency Response

Initially port personnel were given user manuals when they attended training. In addition, manuals were sent to ports. APHIS will query ports to determine which ports are in need of user manuals by April 30, 2005.

OIG Position

We accept APHIS' management decision for this recommendation.

Finding 2   Guidance is Needed to Prevent Data Transmission Lapses

APHIS had no requirements indicating the frequency for transmitting data into the system, and it did not monitor port office transmission activities. Agency officials informed us that they consider port office employees capable of transmitting data on a regular basis without a formal policy. They also stated that they have not experienced any significant problems involving data transmission and, therefore, have no reason to monitor that activity. The port offices we visited generally transmitted data into the system daily. However, officials at all but one port office stated that they had not been informed, either orally or in writing, how frequently to transmit data into the system.

We found that the system does not always contain accurate and up-to-date information. For example, one port office had not transmitted any import data into the system for over a year. Agency officials discovered the failure to transmit data only after they created a system report that obviously understated import activity. We were subsequently informed that over 114,000 birds had entered the county but had not been recorded. Another port office we visited had not transmitted data for over a month. In this instance, a problem in the telecommunication process prevented data from being transmitted to the system. A clear requirement on the frequency of transmitting data, and a process to monitor compliance with the requirement, may have detected these instances in a timelier manner.

We also identified 16 instances where the staff at one port office was unaware that data updates had not been transmitted to the system. (We uncovered these instances during an analysis of port office records for the months of October 2003 and March 2004.) In one instance, port office staff input data into the system related to animals entering the country. However, when the animals did not actually cross the border on that day, they zeroed the original entry and updated the record at a later time. While the port office database was correctly updated, the national system still listed the number of animals entering the country as zero because it was not updated. The port office staff did not detect the problem because it was not included on the transmission report. Agency officials informed us they had not programmed the system to report instances where updates were not transmitted to the national system.

The problems cited above could be reduced or prevented by implementing requirements on the frequency of transmitting data to the system. They could also be detected through the monitoring of port office transmissions.

Recommendation No. 3

Develop and implement procedures to regularly transmit data to the system, and monitor such transmission activity as intended.

Agency Response

APHIS will develop a weekly exception report for the Veterinary Service Process Streamlining System, which could be run by port, area, and regional personnel to assure periodic transmission of import data, by June 30, 2005.

OIG Position

We accept APHIS' management decision for this recommendation.

Finding 3   **Weak Access Controls Jeopardize Data Integrity**

Port office employees were improperly using former employee passwords and user identifications, and were not protecting their own passwords and user identifications. This occurred because the agency's procedures to remove users from the system had not been formally prescribed. Also, the agency was not maintaining employee access lists or monitoring employee actions to safeguard passwords and user identifications. Further, the agency had not provided security awareness training to port office employees. Thus, current employees could access unauthorized areas and manipulate or destroy system records.

Departmental regulations[2] require agencies to remove employee user accounts and passwords when employees are no longer employed by the agency, or no longer need the same access level to perform their duties. APHIS provides similar guidance for modifying or revoking system access for employees transferring to a new position or leaving the agency.[3]

The Office of Management and Budget requires accountability of logical access through identification and authentication of users of the system.[4] The National Institute of Standards and Technology requires auditing and periodically verifying the legitimacy of current accounts and access authorizations.[5]

At two of five offices we visited, we observed employees who were using the passwords and user identifications of former employees to access the system. We also observed that employees at two of five offices were openly displaying their user identifications and passwords. The employees at all of these offices did not view this action as a threat to the system.

We attributed these problems to inadequate procedures to remove users from the system. Since the agency did not have written procedures for us to review, we questioned officials about the process for removing former and transferred employees from the system. The officials informed us that port office staff is responsible for contacting an area office supervisor when a user change is necessary. The area office supervisor contacts the Center for Animal Disease Information and Analysis (the center), which physically removes or changes the user in the system.

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[2] DM 3140-1.6, Appendix D (6) (c), dated March 05, 1992
[3] APHIS Directives 3140.5 (5) b (8), dated May 26, 2000
[4] Circular A-130, Appendix III, "Security of Federal Automated Information Resources"
[5] NIST SP-800-12 (10.2) page 112, "Introduction to Computer Security"

The conditions we noted at port offices appeared to have occurred because the staff in those offices had not contacted area office supervisors. However, we could not be certain because the agency had not documented the process. Port office staff informed us that they had not contacted the area office supervisor to remove the users from the system. An official at the center also stated that they do not periodically review access lists to ensure that only authorized employees can enter the system.

We attributed employee misuse of passwords and user identifications at port offices, in part, to a lack of overall understanding and awareness of system security. The agency had not provided security awareness training to port office employees. Training on the safeguarding of user identifications and passwords is fundamental for securing and protecting the integrity of data in a system. In Audit Report No. 33099-04-Ch, we recommended that the agency develop and implement security awareness training for all agency employees. The agency agreed to provide this training by September 30, 2004 (although this target date was not met). Since our current audit was performed prior to the agency's planned date for providing this training, we are not recommending any further action in this report.

Recommendation No. 4

Develop and implement procedures for deleting system user accounts.

Agency Response

The agency stated that monitoring the retirement or movement of personnel and removing their access is difficult. APHIS will institute a 90-day user password expiration routine for ITS users, by June 30, 2005.

OIG Position

We accept APHIS' management decision for this recommendation.

Recommendation No. 5

Develop procedures to periodically review user access lists and reconcile them to a list of current employees.

Agency Response

The agency stated that monitoring the retirement or movement of personnel and removing their access is difficult. APHIS will institute a 90-day user password expiration routine for ITS users, by June 30, 2005.

OIG Position

We do not accept APHIS' management decision for this recommendation. To reach management decision, APHIS needs to implement a system where user identifications in the system are periodically compared to current employees. This action would ensure that former employees' accounts are removed from the system.

Scope and Methodology

Our audit of application controls over APHIS' Import Tracking System was part of a nationwide audit of selected USDA agencies. Our review was conducted at APHIS' Western Regional office in Fort Collins, CO, and at five port offices; Pembina, ND; El Paso, TX; Presidio, TX; Detroit, MI; and Port Huron, MI. After reviewing the list of 64 ports, we judgmentally selected the 5 port offices based on recommendations from agency officials, location, and those with significant animal import activity.

We conducted our audit from March 2004 through June 2004, in accordance with Government Auditing Standards.

To accomplish our audit objectives, we performed the following audit procedures:

- Reviewed policies, procedures, and system documentation related to the system.

- Interviewed agency officials responsible for the development, management, and data input of the system.

- Performed tests of data authorization, completeness, and accuracy at selected port offices, for October 2003 and March 2004, except for Presidio, TX, where we only reviewed October 2003. We reviewed 834 of 4770 records.

- We obtained from APHIS officials the Import Tracking System Report 220, "Daily Activity", for each port office for the months selected above.

- We compared the randomly selected records from each daily activity report to source importation documents. These included; the certificate of origin, the Declaration of Importation, and any other documents deemed necessary to validate information in the database.

- Conducted scans on the APHIS networks related to the system using operating system vulnerability software.

Exhibit A – APHIS Response to the Draft Report

USDA

**United States
Department of
Agriculture**

**Marketing and
Regulatory
Programs**

**Animal and
Plant Health
Inspection
Service**

**Washington, DC
20250**

TO: Robert W. Young
           Assistant Inspector General
           for Audit

FROM: W. Ron DeHaven   *Kevin Shea for*   MAR 7 2005
           Administrator

SUBJECT: Response to OIG Report: "Review of Applications Controls for the
               Import Tracking System" (Report No. 33501-0001-Ch)

Thank you for the opportunity for the Animal and Plant Health Inspection Service to
comment on the above report. Throughout the 10 month duration of this review, we
had a good working relationship with the OIG team, and appreciated their willingness to
listen to input from Veterinary Services (VS) import staff and Centers for Epidemiology
and Animal Health (CEAH) personnel.

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Exhibit A – APHIS Response to the Draft Report

Background

VS developed and implemented the Import Tracking System (ITS) in 1992. We believe the system has been exceptionally stable, requiring few modifications with the exception of testing and minor enhancements accomplished to certify the system as Y2K compliant.

Personnel at CEAH routinely perform quality checks on import related data stored on the ITS for obvious errors as part of a collaborative effort with the Agriculture Marketing Service (AMS). AMS utilizes data from the ITS in their weekly reporting of imported commodities. In FY 2004, VS and AMS jointly developed an automated process which electronically scans the data in the ITS for potential errors. Our records do indicate a less than 1 percent error rate in key data fields that are quality checked.

The ITS proved its value in December 2003 with the initial tracing of the BSE affected animal that entered Washington state from Canada. The ITS continues to be a reference for other Canadian BSE activities.

The ITS is scheduled for inclusion in 2005 in the VS enterprise system--Veterinary Services Process Streamlining (VSPS)--which integrates information from major import/export related activities. As the import portion of the VSPS is finalized, we will continue to address key recommendations from the OIG review.

Finding 1: Lack of Application Controls Resulted in Input Errors

There is field level error checking on the input forms which assures that data of the appropriate format are entered into the ITS. Unfortunately, there are insufficient personnel at most port locations to provide second-party or supervisory reviews. Instead, the before referenced data review by CEAH staff and the automated scanning process are intended to assist in identifying errors. In addition, within the last two years, both the VS Western and Eastern Regional offices have employed regional personnel to perform oversight of port operations and resulting data.

The minimal staff available at the ports was also taken into account when the initial requirements were gathered for the ITS system. An effort was made to reduce the amount of data required to be entered on ITS to facilitate the workload of the port personnel. Therefore, some of the data fields referenced in the review as non-mandatory were allowed to be so since additional paperwork is received by port personnel that could serve as a reference if data from those fields proved necessary.

The finding of cross-validation between data fields (such as, "castrated male" and "breeding") is a good idea. We will incorporate such controls in VSPS system. We expect to have this completed by April 2005.

Exhibit A – APHIS Response to the Draft Report

APHIS Import Tracking System Security Plan

The initial VS Import Tracking System Application Security Plan originally completed in 2000 rated data integrity as "low risk." When it was updated in 2003 the rating had changed to "high risk - …could provide a grave threat to APHIS' ability to protect American Agriculture and import/export markets." This rating is not correct and should have remained at "low risk" because it has been recognized that there are paper copies of all information that provide back-up to the automated data. We have never had to remove a record from the system due to a concern that an unauthorized person had entered it. A secondary data check on validity of records occurs through the VS user fee system. Erroneous data would be caught through that system as well.

After further discussion, we determine that the Data Integrity of the System should be changed to reflect its original rating of "low risk."

We will modify the 2003 Import Tracking System Security Plan accordingly. We expect to have this completed during April 2005.

Lack of User Manuals at Ports

Initially, port personnel were given user manuals when they attended training. In addition, manuals also were sent to each port. Once we recognized through the review that several ports did not have user manuals, we contacted the regions to determine where additional user manuals needed to be sent.

We have queried ports to determine which ports are in need of user manuals. By April 2005, we expect to have provided such ports with user manuals.

Finding 2: Guidance is Needed to Prevent Data Transmission Lapses

The original system requirements for the ITS recognized that several of the ports have sporadic activity, and therefore a daily transmission of information would not be necessary. However, another report function was integrated into the system that would allow each port to generate a report to document frequency and success of data transmissions. In the past, this report was run by port personnel, but now with the addition of regional personnel providing import/export oversight, a similar report would be of benefit to them, as recommended by the review.

We will develop a weekly exception report for VSPS which could be run by port/area/regional personnel to assure periodic transmission of import data. We expect to have this completed June 2005.

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Finding 3: Weak Access Controls Jeopardize Data Integrity

Monitoring the retirement and/or movement of personnel from port locations and immediately removing access to the ITS with that person's user-id is difficult. We can, however, institute a user password renewal/expiration policy for the VSPS system. This will result in an increase in the volume of hot-line calls as evidenced by similar policies for other systems.

We will institute a 90-day user password expiration routine for ITS users. We expect to have this completed by June 2005.

Again, we appreciate the opportunity to respond to the key findings and recommendations identified by this review. We believe our current and planned actions address the adequacy of application controls over the Import Tracking System.

Informational copies of this report have been distributed to:

Administrator, APHIS
     ATTN: Agency Liaison Officer   9
U.S. Government Accountability Office   1
Office of Management and Budget   1