

**OFFICE OF THE INSPECTOR GENERAL**

**EVALUATION OF THE  
U.S. INTERNATIONAL TRADE COMMISSION'S  
FISCAL YEAR 2007 INFORMATION SECURITY  
PROGRAM AND PRACTICES**

**AUDIT REPORT  
OIG-AR-04-07**



October 1, 2007



---

## UNITED STATES INTERNATIONAL TRADE COMMISSION

---

WASHINGTON, DC 20436

October 1, 2007

IG-EE-023

## MEMORANDUM

TO: THE COMMISSION

We hereby submit Audit Report OIG-AR-04-07, *Evaluation of the U.S. International Trade Commission's Fiscal Year 2007 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 correct weaknesses identified in prior-year OIG FISMA audit reports; and (2) met Federal Information Security Management Act criteria.

We found the Commission made some progress in strengthening its information technology security program during the 2007 fiscal year. The Commission fully implemented 2 of the 12 prior-year recommendations, leaving 10 with further action required. This review did not address the status of four additional FISMA prior-year recommendations pertaining to our technical review of the ITC-Net. The results of that review were reported on June 5, 2007 in audit report *Evaluation of the U.S. International Trade Commission's Fiscal Year 2006 Network Security Controls Audit Report* (OIG-AR-03-07).

In addition to the ten open prior-year recommendations, this report identifies five new weaknesses. These weaknesses relate to:


1. Administration of the Plans of Action and Milestones
2. Compliance with E-Authentication risk assessment requirements
3. Annual security controls testing and evaluating
4. Security awareness training for new employees and contractors
5. Implementation of required minimum security controls

On receiving the Commission's strong disagreement with our interpretation of the requirements related to E-Authentication risk assessments, we requested OMB to provide further guidance on the requirement. As of the date of this report, we have not received that guidance. Therefore, we are putting our finding and two recommendations related to E-Authentication risk assessments on hold until we discuss this issue with OMB. A discussion on compliance with E-Authentication risk assessment requirements is presented in Section B of this report along with management's comments.

We made seven new recommendations to improve the Commission's IT security. The Commission did not agree with two recommendations. Additionally, for four of five agreed upon recommendations, the Commission did not provide planned actions to correct the weaknesses.

The OIG stands by its findings and encourages prompt action towards implementing the recommendations in this report.

We incorporated the response in the body of this report and included it in detail as Appendix C.

A handwritten signature in black ink, appearing to read "Jean Smith". The signature is fluid and cursive, with the first name "Jean" being more prominent than the last name "Smith".

Jean Smith  
Acting Inspector General

CC: Cotton & Company LLP

Due to the sensitive nature of the information contained in our report, we have limited distribution of the report.