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MEMORANDUM TO ASSISTANT REGIONAL ADMINISTRATORS, PBS  
1P, 2P, 3P, 4P, 5P, 6P, 7P, 8P, 9P, 10P, WP  
REGIONAL REALTY SERVICES OFFICERS

THRU: ANTHONY E. COSTA  
DEPUTY COMMISSIONER, PBS – PD

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MANAGEMENT – PQ

SUBJECT: Annual Review of STAR User Access to Ensure Proper  
Segregation of Duties and Electronic Data Security

1. Purpose. This realty services letter requires that the System for Tracking and Administering Real property (STAR) access privileges must be reviewed on a regional level, and each region must create a protocol to provide for an adequate level of security and appropriate segregation of duties among authorizing, verifying, editing, and processing of financial information for lease payments. Importance is placed on 1) the control of the lease budget analyst user privilege, 2) the avoidance of duplicate user privileges, 3) the elimination of shared user privileges, and 4) the annual review of the regional user access privileges and data security procedures.
2. Background.
  - a. The GSA Office of the Inspector General's *Fiscal Year 2003 Audit EDP Management Letter*, item number PBS-SYS-99-05, audit number A010187BFF02008, requests STAR access privileges periodically reviewed and create a protocol to provide for an adequate level of security and appropriate segregation of duties.
  - b. STAR enables certain users to record detailed information pertaining to buildings and financial agreements within the GSA inventory. A user's privileges define the user's access. User privileges should be based upon the individual's job and responsibilities. Once a regional employee logs in, STAR verifies the user's identification code and provides access to windows, fields, and commands. If one individual can create, verify, edit, authorize, record, and process the payment, there is opportunity for fraud.
3. Effective Date/Expiration Date. These instructions are effective immediately to comply with the audit findings. This RSL will expire one year from the date of issuance unless otherwise extended.

4. Cancellation. None.
5. Applicability. All real property leasing activities.
6. Instructions/Procedures.
  - a. Control role of Lease Budget Analyst user privileges. Since individuals with Lease Budget Analyst user privileges can authorize funding obligations and generate lease payment authorization documents, regional officials must take care in assigning this user privilege. To properly keep track of this individual's access within STAR, it is recommended that this individual not possess any additional user privileges within STAR. Further, in accordance with Federal Acquisition Regulations subpart 7.503, the disbursement of federal funds is an inherently governmental function. Therefore, the Lease Budget Analyst user privilege must not be assigned to contractor personnel.
  - b. Avoid duplicate user privileges. User identification and the generation of the work queue in STAR are critical in properly tracing each step of the electronic transaction. Audit records have indicated the same individual with duplicate roles and multiple user identifications generating work queues to one of their other user identities. Though this is sometimes unavoidable due to limited resources, the practice must be discouraged, avoided, or eliminated whenever possible.
  - c. Eliminate shared user privileges. STAR user identification is critical in properly tracing individual accountability with each electronic transaction. Audit records have revealed teams of individuals are sharing the same user identification and user privileges. In compliance with the Federal Information Security Manager Act (FISMA) of December 2002, as implemented by GSA Order CIO P 2100.1B, entitled *GSA Information Technology (IT) Security Policy*, the sharing of passwords or user identification access compromises electronic data security and individual accountability. In coordination with the STAR Support Center, regional management must perform and document an annual review of all regional user privileges to ensure adherence to information security procedures.
  - d. Annual regional review and self-assessment of user access privileges. In compliance with GSA Order CIO P 2100.1B, each region, on an annual basis, must ensure an adequate level of security and data protection and review user access privileges and user authorization listings to determine whether they are appropriate. In coordination with the STAR Support Center, each region, on an annual basis, must: i) create a written protocol to ensure an adequate level of system security and data protection and ii) compile its list of active STAR users and their privileges to ensure an appropriate segregation of duties. The Assistant Regional Administrator, Public Buildings Service, should formally approve the protocol and any inconsistent user privilege conditions.