



Pension Benefit Guaranty Corporation  
Office of Inspector General  
1200 K Street, N.W., Washington, D.C. 20005-4026

November 21, 2013

The Honorable Sylvia Mathews Burwell  
Director  
Office of Management and Budget  
725 17th Street, NW  
Washington, DC 20503

Dear Ms. Burwell:

The Pension Benefit Guaranty Corporation (PBGC) Office of Inspector General (OIG) contracted with CliftonLarsonAllen LLP, an independent public accounting firm, to perform the independent evaluation and review of PBGC's information and technology (IT) security required by the Federal Information Security Management Act (FISMA), Federal Managers' Financial Integrity Act (FMFIA) and the Office of Management and Budget. Under OIG oversight, the review assessed the effectiveness of PBGC's information security program and practices to determine compliance with the requirements of FISMA and related information security policies, procedures, standards, and guidelines. CliftonLarsonAllen used the Government Accountability Office's Federal Information Systems Controls Audit Manual as well as guidance issued by the National Institute of Standards and Technology to assess the impact of these controls on PBGC's significant IT systems and operations. Specifically, the areas of review included:

- Entity-wide security program planning and management;
- Access control; and
- Configuration management.

IT continues to be a challenge for management. PBGC has made progress in addressing IT security weaknesses at the root-cause level by establishing the foundation for effective security controls within the NIST Risk Management Framework, but these controls require time to mature and show evidence of their effectiveness. PBGC has continued to lay the groundwork in the deployment of tools, acquisition of staff, and development of approaches that will enable the Corporation to better manage the design, implementation, and operational status and effectiveness of its IT security controls.

Access controls and configuration management controls are an integral part of an effective information security management program. Access controls remain a systemic problem throughout the Corporation. PBGC's past decentralized approach to system development, system deployments, and configuration management created an environment that lacks a cohesive structure in which to adequately implement controls and best practices. In prior years, we reported that PBGC's entity-

wide security program lacked focus and a coordinated effort to resolve control deficiencies. Though progress was made, deficiencies persisted in FY 2013, which prevented PBGC from implementing effective security controls to protect its information from unauthorized access, modification, and disclosure. PBGC is building a foundation to correct systematic issues and support the future of its Information Technology. Despite the improvements, as PBGC has acknowledged it will be a number of years before significant systemic issues are fully addressed.

The OIG will continue to work with and support PBGC through our reviews and analysis related to the agency's mission and programs, including information technology security.

Sincerely,

A handwritten signature in cursive script that reads "Rashmi Bartlett".

Rashmi Bartlett  
Assistant Inspector General for Audit