



Office of Inspector General
Pension Benefit Guaranty Corporation

November 17, 2015

VIA EMAIL

The Honorable Ron Johnson
Chairman
U.S. Senate Committee on Homeland Security and Governmental Affairs

The Honorable Charles E. Grassley
Chairman
U.S. Senate Judiciary Committee

Dear Chairman Johnson and Chairman Grassley:

Since 2010, Inspectors General have been requested to provide a biannual report of “all closed investigations, evaluations, and audits conducted by the IG offices that were not disclosed to the public.” In a February 27, 2015, letter you reiterated your continuing efforts to support the Inspector General community in protecting taxpayers against waste, fraud and abuse and requesting enhanced reporting to the committee.

I provide this information for the period April 1, 2015 through September 30, 2015. Our numbering tracks the numbering in your 2015 request:

- 1. *An accounting of all outstanding unimplemented recommendations as well as the aggregate potential cost savings of these open recommendations including:***
 - a. The current number of open and unimplemented recommendations***
 - b. The dates on which the open and unimplemented recommendations were initially made;***
 - c. Whether agency management has agreed or disagreed with the recommendations; and***
 - d. The total potential cost savings to the agency of the current open and unimplemented recommendations.***

Attachment 1 is a table listing 163 open OIG audit recommendations as of September 30, 2015. The agency agreed with all recommendations and we have no open

audit recommendations associated with a specific cost savings, i.e., questioned costs or funds to be put to better use.

2. A narrative description of all audits, evaluations, and investigations provided to the agency for comment but not responded to within 60 days.

We have no audits, evaluations or investigations where the agency has not responded within 60 days.

3. A report on each investigation involving GS-15 level or above employees, or, other Federal pay scale equivalent employees, at a Federal agency or department where misconduct was found, but no prosecution resulted, including:

- a. A detailed description of the facts and circumstances of the investigation; and**
- b. A detailed description of the status and disposition of the matter, including whether there was a referral to the Department of Justice, the date of any such referral, whether there was a declination from the Department, the date of any such declination, and an explanation of the reasons for any such declination.**

We have no responsive records.

4. Detailed descriptions of any instances of whistleblower retaliation, including information about the official found to have engaged in retaliation and what, if any consequences, the agency imposed to hold that official accountable.

We have no responsive records.

5. Detailed descriptions of any attempts to interfere with IG independence, including:

- a. Restricting communications between the IG office and Congress; and**
- b. Budgetary constraints designed to limit the capabilities of the IG office.**

We have no instances of attempts to interfere with IG independence by restricting communication with Congress or imposition of budgetary constraints.

6. A detailed description of any incident where the Federal agency or department, as applicable, has resisted or objected to oversight activities of the IG office or restricted or significantly delayed access to information, including the justification of the Federal agency or department for such action.

We have no instances of attempts to restrict the oversight activities of our office or restrict or significantly delay access to information.

7. A detailed description of any investigation, evaluation, audit or report that is closed and was not disclosed to the public.

Audit/Evaluation Reports. With limited exceptions, we post all audit and evaluation reports on our website within three days of issuing the final report to PBGC. We would not provide or post on our website the full text of reports that would disclose specific vulnerabilities that could be exploited; typically, such reports are IT-related. We also limit disclosure of those reports within PBGC. In addition, there are two other annual reports that are not publicly-posted: the template report required by the Office of Management and Budget for compliance with the Federal Information Security Management Act (FISMA) and the financial statement audit management letter.

During this reporting period we did not issue any restricted disclosure or non-public audit/evaluation reports.

Investigative Reports. We do not post any investigative reports on our website due to privacy concerns. To provide necessary information for the agency to consider appropriate corrective actions, the reports contain significant personally-identifiable and other sensitive information. Posting these reports would require significant redactions. However, we do summarize each significant investigation in our Semiannual Reports to Congress, each of which is posted on our website <http://oig.pbgc.gov/index.html>.

If you have any questions about this response or about any of our OIG work, please contact me or have a member of your staff contact Bill Owens, Chief of Staff at (202) 326-4030.

Respectfully submitted,



Robert A. Westbrook
Inspector General

cc:

The Honorable Thomas R. Carper
Ranking Minority Member
Committee on Homeland Security and Governmental Affairs

The Honorable Patrick J. Leahy
Ranking Minority Member
Committee on the Judiciary

Attachment 1: Summary of PBGC Open Recommendations as of September 30, 2015

	Recommendation Number	Date Issued	Recommendation	Report Title	Potential Cost Savings	Agency Agreement
1	BAPD-109	5/14/2013	Develop a strategic approach to identify the root cause of the recurring PICS systems access and implement the appropriate solution to restrict access to PICS files to all PBGC/FBA employees.	FY 2012 Financial Statement Audit Management Letter	\$0	Yes
2	BAPD-116	5/14/2013	BAPD management should refine their monitoring procedures within the PDR process to ensure that each reviewer verifies that the staff selects the appropriate sample size in accordance with their prescribed procedures.	FY 2012 Financial Statement Audit Management Letter	\$0	Yes
3	BAPD-119	1/31/2014	BAPD should refine its monitoring procedures of the Field Benefit Administration and Post Valuation Administration's Quality Control Review to ensure that independent assessments are performed at the FBAs/PVAs, which should include evidence of the testing performed by the COR and a procedure on how to select and document samples used to perform the assessments.	Fiscal Year 2013 Financial Statement Audit Management Letter Report	\$0	Yes
4	BAPD-121	1/31/2014	BAPD should strengthen its procedures to ensure that the ACR Checklist is reviewed in a timely manner by a GS-13 level TPD actuary or higher.	Fiscal Year 2013 Financial Statement Audit Management Letter Report	\$0	Yes

5	BAPD-130	2/27/2015	PBGC should include the post-DoPT recovery for case 213919 Nortel Networks in its determination of that plan's liabilities.	Fiscal Year 2014 Management Letter	\$0	Yes
6	BAPD-131	2/27/2015	PBGC should correct the inputs to IPVFB for case 214858 Community Health Association for its future liability calculations: the early retirement factor for assumed retirement age should be changed from .95 to .96.	Fiscal Year 2014 Management Letter	\$0	Yes
7	BAPD-132	2/27/2015	PBGC should develop a process for requesting post-DoPT recovery data from Financial Operation Department (FOD) that ensures that plans that have been promoted from EST to FNF status since the prior fiscal quarter are inspected to determine if they should be included with the request.	Fiscal Year 2014 Management Letter	\$0	Yes
8	BAPD-59	2/23/2010	Ensure all de minimis overpayments are written-off in accordance with the BAPD Operations Manual.	FY 2009 Financial Statements Audit Management Letter	\$0	Yes
9	BAPD-60	2/23/2010	Ensure all overpayments over \$500 made to deceased participants' estates are recouped in accordance with the BAPD Operations Manual TP 6.	FY 2009 Financial Statements Audit Management Letter	\$0	Yes
10	BAPD-61	2/23/2010	Amend the BAPD Operations Manual to include a specific time period for which the write off memo for de minimis overpayments should be produced and imaged into IPS.	FY 2009 Financial Statements Audit Management Letter	\$0	Yes

11	BAPD-72	2/24/2011	Review the process followed for this case and determine if established procedures are adequate to prevent this type of mistake from recurring.	FY 2010 Financial Statement Audit Management Letter	\$0	Yes
12	BAPD-82	3/31/2011	Develop and maintain a process to share "lessons learned" and best practices in a formal and consistent manner to ensure that all appropriate personnel become aware of best practices and are able to use them in future audits.	PBGC's Plan Asset Audit of National Steel Pension Plans was Seriously Flawed	\$0	Yes
13	CCRD-14	2/27/2015	PBGC should update their A-123 Internal Control Assessment Procedures to include: a. Thorough explanation of the criteria and selection process used to determine controls selected for testing on the three-year rotational basis. The rotation plan should allow for management to revise their selections based on changing environment and/or processes and b. A testing procedure to verify the completeness of the populations' files is performed prior to sampling. If not applicable, CCRD should document its rational/approach for not verifying the completeness of the population.	Fiscal Year 2014 Management Letter	\$0	Yes
14	CCRD-15	2/27/2015	PBGC should update current controls related to Premiums to reflect current control activities and/or practices.	Fiscal Year 2014 Management Letter	\$0	Yes
15	CCRD-16	2/27/2015	CCRD should update their A-123 Internal Control Assessment Procedures to include a thorough review of the work performed by the third party contractor to verify the testing performed is	Fiscal Year 2014 Management Letter	\$0	Yes

			appropriate and meets the control objective, and documentation of the review.			
16	CCRD-17	2/27/2015	PBGC should revise the Entity-Wide Risk Assessment Survey instructions to provide greater clarity and examples.	Fiscal Year 2014 Management Letter	\$0	Yes
17	CCRD-18	2/27/2015	PBGC should develop a mapping document that clearly outlines the connection between the results of the risk assessment and the Entity-Wide Controls tested for A-123. The documentation should identify which controls relate to the risks identified. When changes in significant risks occur, PBGC should update its key controls over the related processes that are impacted and related to the test plans to ensure management is adequately addressing the operational effectiveness of those controls.	Fiscal Year 2014 Management Letter	\$0	Yes
18	CCRD-19	5/14/2015	Reassess the financial assistance loans payments to insolvent multiemployer plans as part of the Corporation's FY 2016 improper payments assessment.	FY 2014 Audit of PBGC's Compliance with the Implementation of the Improper Payments Information Act	\$0	Yes
19	CCRD-20	5/14/2015	Establish a policy for minimum samples sizes for IPIA assessments and monitor compliance with the PBGC requirements.	FY 2014 Audit of PBGC's Compliance with the Implementation of the Improper Payments Information Act	\$0	Yes

20	CPAD-01	3/21/2014	Ensure policies implemented incorporate guidelines to promote transparency for publicly reporting information regarding negotiated funding agreements, including criteria for when agreements, modifications and other relevant information will be included in press releases.	Increased Oversight, Internal Controls and Performance Accountability Needed for PBGC's Monitoring, Enforcing and Modifying Negotiated Funding Agreements	\$0	Yes
21	FISMA-09-08	3/22/2010	Develop, maintain and update PBGC's entity-wide plan of action and milestones, at least on a quarterly basis, and ensure it includes all entity-wide security deficiencies noted.	FY 2009 FISMA Independent Evaluation Report	\$0	Yes
22	FISMA-09-09	3/22/2010	Disseminate PBGC's entity wide POA&M to all responsible parties to ensure corrective actions are taken in accordance with POA&M.	FY 2009 FISMA Independent Evaluation Report	\$0	Yes
23	FISMA-11-02	5/30/2012	Remove PII from the development environment.	Fiscal Year 2011 Federal Information Security Management (FISMA) Independent Evaluation Report	\$0	Yes
24	FISMA-13-08	3/21/2014	Complete a security risk assessment for PIMS.	Fiscal Year 2013 Federal Information Security Management Act Final Report	\$0	Yes
25	FISMA-13-10	3/21/2014	Ensure that PIMS is included in the PBGC COOP.	Fiscal Year 2013 Federal Information Security Management Act Final Report	\$0	Yes

26	FISMA-13-11	3/21/2014	Develop and document a Contingency Plan for PIMS.	Fiscal Year 2013 Federal Information Security Management Act Final Report	\$0	Yes
27	FISMA-13-12	3/21/2014	Ensure that PIMS is adequately supported by PBGC's general support systems and inherits common controls from these systems.	Fiscal Year 2013 Federal Information Security Management Act Final Report	\$0	Yes
28	FISMA-13-14	3/21/2014	PRAD should adopt and implement PBGC's Life Cycle Security Standard in its maintenance of PIMS.	Fiscal Year 2013 Federal Information Security Management Act Final Report	\$0	Yes
29	FISMA-13-15	3/21/2014	Develop and implement technical controls to separate incompatible duties in PIMS.	Fiscal Year 2013 Federal Information Security Management Act Final Report	\$0	Yes
30	FISMA-13-16	3/21/2014	Conduct a Security Assessment and Authorization (SA&A) review process for PIMS.	Fiscal Year 2013 Federal Information Security Management Act Final Report	\$0	Yes
31	FISMA-13-17	3/21/2014	Ensure the Information Security Agreement Tracking Document is reviewed for accuracy and completeness.	Fiscal Year 2013 Federal Information Security Management Act Final Report	\$0	Yes
32	FISMA-13-18	3/21/2014	Review the Information Security Agreements to ensure they are current and complete.	Fiscal Year 2013 Federal Information Security Management Act Final Report	\$0	Yes

33	FISMA-14-01	5/6/2015	With OIT's technical assistance, all business units should implement the default site policies and guidelines provided by the PBGC Connect Governance Council. Additionally, business areas should implement any additional, business-specific guidance required for their sites.	Fiscal Year 2014 Federal Information Security Management Act Independent Evaluation Report	\$0	Yes
34	FISMA-14-02	5/6/2015	All business units using PBGC Connect should implement policies and guidelines to restrict users from storing structured, application-derived data inappropriately in PBGC Connect.	Fiscal Year 2014 Federal Information Security Management Act Independent Evaluation Report	\$0	Yes
35	FISMA-14-03	5/6/2015	PBGC should implement a tool that has preventive control capability to block documents containing PII from being uploaded to sites that are not CUI-tagged.	Fiscal Year 2014 Federal Information Security Management Act Independent Evaluation Report	\$0	Yes
36	FISMA-14-04	5/6/2015	PBGC should refine and finalize SharePoint Fast Search & PII Data Daily Check to include the timeframe for the removal of PII, and management oversight to confirm timely removal of PII.	Fiscal Year 2014 Federal Information Security Management Act Independent Evaluation Report	\$0	Yes
37	FISMA-14-05	5/6/2015	Determine whether the existence of PII in PBGC Connect that are not in the proper Controlled Unclassified Information sites is a violation of the Privacy Act. If so, assess the violation and make the appropriate reports of Privacy Act disclosures.	Fiscal Year 2014 Federal Information Security Management Act Independent Evaluation Report	\$0	Yes

38	FISMA-14-06	5/6/2015	Establish controls to ensure that FOD's POA&Ms are tracked appropriately and updated regularly in CSAM in accordance with FOD's Continuous Monitoring program.	Fiscal Year 2014 Federal Information Security Management Act Independent Evaluation Report	\$0	Yes
39	FISMA-14-07	5/6/2015	OIT should finalize the deployment of CSAM as the official system of record for POA&M management.	Fiscal Year 2014 Federal Information Security Management Act Independent Evaluation Report	\$0	Yes
40	FISMA-14-08	5/6/2015	Ensure all personnel involved in the POA&M management process receive the proper CSAM training.	Fiscal Year 2014 Federal Information Security Management Act Independent Evaluation Report	\$0	Yes
41	FISMA-14-09	5/6/2015	Assign separate accounts to each individual who needs access to Comprizon.	Fiscal Year 2014 Federal Information Security Management Act Independent Evaluation Report	\$0	Yes
42	FISMA-14-10	5/6/2015	Establish and document an entity-wide ISCM strategy using PBGC risk assessments.	Fiscal Year 2014 Federal Information Security Management Act Independent Evaluation Report	\$0	Yes
43	FISMA-14-11	5/6/2015	Establish and implement a consistent entity-wide ISCM program in accordance with PBGC's ISCM strategy, to include metrics assisting PBGC in evaluating and controlling ongoing risks.	Fiscal Year 2014 Federal Information Security Management Act Independent Evaluation Report	\$0	Yes
44	FISMA-14-12	5/6/2015	PBGC should review IT security personnel positions and assess which require a top secret clearance to effectively perform the job.	Fiscal Year 2014 Federal Information Security Management Act Independent Evaluation Report	\$0	Yes

45	FISMA-14-15	5/6/2015	Develop, document and implement a process for the timely assessment of employees and contractors transferred or promoted to a new position or role to determine whether the risk-level has changed.	Fiscal Year 2014 Federal Information Security Management Act Independent Evaluation Report	\$0	Yes
46	FISMA-14-19	5/6/2015	Assess PBGC's current process and critical control points in identifying all assets connected to the PBGC network. Determine the shortcomings in PBGC's current process to compile an accurate and comprehensive inventory of all assets and connections to the PBGC network.	Fiscal Year 2014 Federal Information Security Management Act Independent Evaluation Report	\$0	Yes
47	FISMA-14-20	5/6/2015	Reconcile PBGC's IP address inventory with the independent IP address inventory determined by the annual OIG assessment. Determine why differences exist and develop and implement a strategy to reconcile and eliminate differences in the IP address inventory count.	Fiscal Year 2014 Federal Information Security Management Act Independent Evaluation Report	\$0	Yes
48	FOD-334	11/15/2004	Implement controls to reconcile Form 1 information received by PBGC to Form 5500 information received by the Department of Labor as a means of identifying plans that have not filed or paid their associated premiums.	Audit of the Pension Benefit Guaranty Corporation's Fiscal Years 2004 and 2003 Financial Statements	\$0	Yes
49	FOD-399	2/27/2015	FOD should establish, document, and implement a process for the reconciliation of the Form 5500 filing data from the DOL into the PPS and follow-up	Fiscal Year 2014 Management Letter	\$0	Yes

			on differences and logged record errors prior to use.			
50	FS-07-07	11/15/2007	Recommendation text omitted to protect exploitation of vulnerability; report is limited disclosure.	Limited Disclosure Report on Internal Controls-PBGC's FY 2007 and 2006 Financial Statements Audit	\$0	Yes
51	FS-07-08	11/15/2007	Recommendation text omitted to protect exploitation of vulnerability; report is limited disclosure.	Limited Disclosure Report on Internal Controls-PBGC's FY 2007 and 2006 Financial Statements Audit	\$0	Yes
52	FS-07-10	11/15/2007	Recommendation text omitted to protect exploitation of vulnerability; report is limited disclosure.	Limited Disclosure Report on Internal Controls-PBGC's FY 2007 and 2006 Financial Statements Audit	\$0	Yes
53	FS-07-11	11/15/2007	Recommendation text omitted to protect exploitation of vulnerability; report is limited disclosure.	Limited Disclosure Report on Internal Controls-PBGC's FY 2007 and 2006 Financial Statements Audit	\$0	Yes
54	FS-07-12	11/15/2007	Recommendation text omitted to protect exploitation of vulnerability; report is limited disclosure.	Limited Disclosure Report on Internal Controls-PBGC's FY 2007 and 2006 Financial Statements Audit	\$0	Yes

55	FS-07-14	11/15/2007	Recommendation text omitted to protect exploitation of vulnerability; report is limited disclosure.	Limited Disclosure Report on Internal Controls-PBGC's FY 2007 and 2006 Financial Statements Audit	\$0	Yes
56	FS-07-17	11/15/2007	Recommendation text omitted to protect exploitation of vulnerability; report is limited disclosure.	Limited Disclosure Report on Internal Controls-PBGC's FY 2007 and 2006 Financial Statements Audit	\$0	Yes
57	FS-08-02	11/13/2008	Implement an effective review process to validate the completion of the certification and accreditation packages for all major applications and general support systems. The review should be performed by an individual not associated with the performance or an individual that could not influence the results of the C&A. This review should be completed for all components of the work performed to ensure substantial documentation is available that supports and validates the results obtained.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2008 and 2007 Financial Statements Audit	\$0	Yes
58	FS-08-03A	11/13/2008	Implement an independent and effective review process to validate the completion for the A&A packages for all major applications.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2008 and 2007 Financial Statements Audit	\$0	Yes
59	FS-09-01	11/12/2009	Effectively communicate to key decision makers the state of PBGC's IT infrastructure and	Report on Internal Controls Related to the Pension Benefit Guaranty	\$0	Yes

			environment to facilitate the prioritization of resources to address fundamental weaknesses.	Corporation's Fiscal Year 2009 and 2008 Financial Statements Audit		
60	FS-09-03	11/12/2009	Develop and implement a well-designed security management program that will provide security to the information and information systems that support the operations and assets of the Corporation, including those managed by contractors or other Federal agencies.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2009 and 2008 Financial Statements Audit	\$0	Yes
61	FS-09-04	11/12/2009	Complete the development and implementation of the redesign of PBGC's IT infrastructure, and the procurement and implementation of technologies to support a more coherent approach to providing information services and information system management controls.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2009 and 2008 Financial Statements Audit	\$0	Yes
62	FS-09-05	11/12/2009	Ensure that adequate documentation is maintained which supports, substantiates, and validates all results and conclusions reached in the C&A process.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2009 and 2008 Financial Statements Audit	\$0	Yes
63	FS-09-06	11/12/2009	Establish and implement comprehensive procedures and document the roles and responsibilities that ensure oversight and accountability in the certification and review process. Retain evidence of oversight reviews and take action to address erroneous or unsupported reports of progress.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2009 and 2008 Financial Statements Audit	\$0	Yes

64	FS-09-07	11/12/2009	Maintain an accurate and authoritative inventory list of major applications and general support systems. Ensure the list is disseminated to responsible staff and used consistently throughout PBGC OIT operations.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2009 and 2008 Financial Statements Audit	\$0	Yes
65	FS-09-12	11/12/2009	Develop and implement a coherent strategy for correcting IT infrastructure deficiencies and a framework for implementing common security controls, and mitigating the systemic issues related to access control by strengthening system configurations and user account management for all of PBGC's information systems.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2009 and 2008 Financial Statements Audit	\$0	Yes
66	FS-09-17	11/12/2009	Assess the risk associated with lacking segregation of duties, password management, and overall inadequate system configuration. Discuss risk with system owners and implement compensating controls wherever possible. If compensating controls cannot be implemented the system owner should sign-off indicating risk acceptance.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2009 and 2008 Financial Statements Audit	\$0	Yes
67	FS-09-20	11/12/2009	Implement controls to remedy weaknesses in the deployment of servers, applications, and databases in the development, test, and production environments.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2009 and 2008 Financial Statements Audit	\$0	Yes
68	FS-11-07	11/14/2011	Develop a quality assurance program aimed to ensure that plan asset valuations meet the regulatory standard of determining fair market	Report on Internal Controls Related to the Pension Benefit Guaranty	\$0	Yes

			value based on the method that most accurately reflects fair market value.	Corporation's Fiscal Year 2011 and 2010 Financial Statement		
69	FS-11-09	11/14/2011	Identify those plans that might potentially have a pervasive misstatement to the financial statements if DOPT asset values were originally misstated. Management should then re-evaluate the DOPT asset values for those identified plans and consider the impact of any known differences on the financial statements.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2011 and 2010 Financial Statement	\$0	Yes
70	FS-11-11	11/14/2011	Ensure adequate documentation is maintained, which supports, substantiates, and validates benefit payment calculations by implementing proper monitoring and enforcement measures in compliance with approved policies and procedures.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2011 and 2010 Financial Statement	\$0	Yes
71	FS-11-16	11/14/2011	Develop and implement a policy to identify and document the risks associated with PBGC operations performed in foreign countries, ensure appropriate management review, and take appropriate actions to mitigate identified risks.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2011 and 2010 Financial Statement	\$0	Yes
72	FS-12-02	11/15/2012	PBGC should develop and implement a comprehensive documentation retrieval system that clearly identifies the location of the participants' census data and benefit calculation elements in a systematic manner.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporations' Fiscal 2012 and 2011 Financial Statements Audit	\$0	Yes

73	FS-12-05	11/15/2012	PBGC should refine their current procedures for processing plans and uploading participant data in the Genesis database to ensure that the best available data is used to support benefit payments and Integrated Present Value liabilities.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporations' Fiscal 2012 and 2011 Financial Statements Audit	\$0	Yes
74	FS-13-01	11/15/2013	PBGC should promptly correct the errors in its calculations identified by the auditors.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporations' Fiscal 2012 and 2011 Financial Statements Audit	\$0	Yes
75	FS-13-02	11/15/2013	PBGC should develop and implement improvements to the BAPD Systems (Spectrum and the Integrated Present Value of Future Benefits (IPVFB)) systems to: Record and value separate benefit components payable under different annuity forms; Record and value anticipated future benefit amount changes; Value temporary joint and survivorship (J&S) benefits.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporations' Fiscal 2012 and 2011 Financial Statements Audit	\$0	Yes
76	FS-13-07	11/15/2013	Develop, document and implement controls to consistently secure information embedded in spreadsheets, and limit access to spreadsheets to those with business needs.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporations' Fiscal 2012 and 2011 Financial Statements Audit	\$0	Yes
77	FS-14-01	11/14/2014	Promptly correct errors in its calculations and data entries identified by the auditors during FY 2014.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes

78	FS-14-02	11/14/2014	PBGC should perform an analysis to identify risks associated with a lack of documentation to support all participants' benefit calculations and assess the impact to the calculations and related liability.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
79	FS-14-03	11/14/2014	Upon completion of analysis, PBGC should develop a policy to finalize management's position on the financial impact of the lack of documentation issue and any actions that will be taken to address this systemic issue. The policy should also document any residual risk that it may elect to accept.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
80	FS-14-04	11/14/2014	Develop and document a risk assessment of the BAPD's entire operations. The risk assessment should include the identification of all the root causes of the issues identified by the auditors and ASD. PBGC should monitor the implemented corrective actions. The materiality thresholds used should be reasonable.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
81	FS-14-05	11/14/2014	Review known case 187419 (Allegheny Health) in light of the calculation exception for Sample 27 and determine if other plan participants are receiving incorrect benefits due to the miscalculation of the Retirement Service Credit Fraction. PBGC should insure that all data and calculation methodology is properly stored and documented. Interim calculations of data elements used to determine the Termination Benefit should be archived with the actuarial case report and the methodology	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes

			described the actuarial case memo. For sample 27, the data used to determine the Retirement Service Credits, which is the basis for the Retirement Service Credit Fraction calculation was completed outside of the valuation spreadsheet and the methodology and the data were not archived.			
82	FS-14-06	11/14/2014	Expand modernization efforts to Spectrum and the Integrated Present Value of Future Benefits (IPVFB) systems to: 1. Value the actual popup benefit for Joint and Survivor Popup annuity forms. 2. Value non-level and surviving spouse benefits without the need for supplemental tables.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
83	FS-14-07	11/14/2014	Ensure that deviations from established procedures should be properly documented and approved.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
84	FS-14-08	3/21/2014	Update and document the security event categorization procedures and decision process to better define the thresholds where security events are categorized as suspicious and are recorded in a ticketing system as an incident for escalation and further analysis.	Fiscal Year 2013 Federal Information Security Management Act Final Report	\$0	Yes
85	FS-14-09	3/21/2014	Establish a periodic review (at least quarterly) process for contractor's compliance, including the execution of PBGC's security event categorization procedures and decision process, review of	Fiscal Year 2013 Federal Information Security Management Act Final Report	\$0	Yes

			Intrusion Detection System (IDS) logs, and other continuous monitoring activity.			
86	FS-14-10	3/21/2014	Ensure that security incidents are documented, investigated, reported to federal management, and corrective actions implemented to remediate security vulnerabilities.	Fiscal Year 2013 Federal Information Security Management Act Final Report	\$0	Yes
87	FS-14-11	3/21/2014	Develop factors to prioritize incidents such as the functional impact of the incident (e.g., current and likely future negative impact to business functions), the information impact of the incident (e.g., effect on the confidentiality, integrity, and availability of PBGC's information), and the recoverability from the incident (e.g., the time and types of resources that must be spent on recovering from the incident).	Fiscal Year 2013 Federal Information Security Management Act Final Report	\$0	Yes
88	FS-14-12	3/21/2014	Assess and document the adequacy of PBGC's current data loss prevention controls in place and determine if additional controls are needed based on cost and risk.	Fiscal Year 2013 Federal Information Security Management Act Final Report	\$0	Yes
89	FS-14-13	3/21/2014	Develop and implement controls to enhance PBGC's ability to identify inappropriate or unusual activity, integrate the analysis of vulnerability scanning information, performance data, network monitoring, and system audit record (log) information.	Fiscal Year 2013 Federal Information Security Management Act Final Report	\$0	Yes

90	FS-14-15	11/14/2014	FOD should perform a comprehensive analysis of key data inputs (e.g., participant count, market value, etc) between Form 5500 and Comprehensive Premium Filing to identify significant variances. In addition, management should develop a risk analysis that focuses on evaluating the underlying causes of the significant variances identified from the comprehensive analysis and assess the potential impact to the completeness assertion for premiums.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
91	FS-14-16	11/14/2014	FOD should perform a period to period (e.g., year to year, quarter to quarter, etc.) fluctuation/variance analysis of plan premium summary level data to identify anomalies, unusual trends, and other critical factors evaluated by management. The underlying cause of the variances should be investigated and documented based on thresholds established by management.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
92	FS-14-17	11/14/2014	FOD should develop a comprehensive list of premium filing scenarios that could impact the premium income accrual calculations. These scenarios should be used to update/refine the PPS system calculation functionality.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
93	FS-14-19	11/14/2014	FOD management should update their financial statement footnotes disclosures to adequately disclose pertinent events or circumstances that provide useful information and focus user's	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes

			attention on matters that are most relevant to understanding premium revenue.			
94	FS-14-20	11/14/2014	FOD should develop a procedure to reconcile the PPS subsidiary ledger to general ledger reconciliation. The reconciliation must reflect the cumulative PPS subsidiary balance compared to the general ledger at a point in time (e.g., December 31, March 31, June 30, etc.). Any differences should be aggregated by type (e.g., timing differences, manual adjustments) and explained. The support for these differences must be maintained for supervisory and/or external review. In addition, each reconciliation must show evidence of preparer and supervisory review.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
95	FS-14-21	11/14/2014	PBGC should update current procedures and the Premium cycle memo to reflect current control activities and/or practices related to the premium reconciliation process.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
96	FS-14-22	11/14/2014	FOD should update current Premium and Practitioner System reporting functionality to provide a detailed summary fixed and variable rate premium report by plan for each reporting period. This report should be used as the principal support for the PPS balance reported on the PPS subsidiary ledger to general ledger reconciliation.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes

97	FS-14-26	11/14/2014	FOD should maintain a complete listing of all key financial spreadsheets.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
98	FS-14-27	11/14/2014	Develop a procedure to update the key financial listing that is provided to the CFO annually.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
99	FS-14-28	11/14/2014	Establish a policy that outlines responsibilities for business owners that create key financial spreadsheets.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
100	FS-14-29	11/14/2014	FOD should conduct a risk assessment to evaluate PBGC's reliance on key financial spreadsheets that support the Corporation's financial reporting.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
101	FS-14-30	11/14/2014	PBGC should develop and implement access and integrity controls to assure the completeness and accuracy of key financial spreadsheets.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
102	FS-14-31	11/14/2014	PBGC should develop and implement procedures that require business owners who prepare key financial spreadsheets to document and provide evidence of their implementation of integrity and access controls.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes

103	FS-14-35	11/14/2014	FOD should strengthen their internal control procedures by establishing steps to ensure all Trust Accountants (TAs) are recording non-commingled account balances appropriately and consistently. In addition, the procedures should specify a review and/or reconciliation process that should be performed by personnel with sufficient experience and knowledge and in a timely manner to ensure errors are identified and corrected within the same accounting period.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
104	FS-14-39	11/14/2014	The Actuarial Services Division/BAPD should strengthen its quality control review process over the Present Value of Nonrecoverable Future Financial Assistance to verify that all key data is properly supported and reasonable.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
105	FS-14-40	11/14/2014	The Actuarial Services Division/BAPD should implement the corrections of the errors identified by the auditors during the FY 2014 testing of the Present Value of Nonrecoverable Future Financial Assistance (for samples 17, 22, 27, 33, and 34).	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
106	FS-14-41	11/14/2014	The Actuarial Services Division/BAPD should undertake a consolidation and codification of its technical procedures and actuarial practices into a single documentation source for single employer plan valuations.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes

107	FS-14-42	11/14/2014	The Actuarial Services Division/BAPD should undertake a consolidation and codification of its technical procedures and actuarial practices into a single documentation source for multiemployer plan valuations.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
108	FS-14-43	11/14/2014	The Actuarial Services Division/BAPD should undertake training of its staff to ensure implementation of the established policy for obtaining up-to-date plan and valuation data for all cases.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
109	FS-14-44	11/14/2014	The Actuarial Services Division/BAPD should implement a tracking system to monitor its request for the most recent data to ensure timely response.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
110	FS-14-45	11/14/2014	The Actuarial Services Division/BAPD should develop a comprehensive policy that describes specific acceptable documentation requirements used to support plan liability valuation. In addition, the policy should include documentation retention requirements. For example, maintenance requirements for old withdrawal liability payment schedules that impact a plan valuation.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
111	FS-14-46	11/14/2014	The Office of Negotiations and Restructuring Actuarial Division should implement a process to monitor the raw data entered into the tool to	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes

			identify missing plan data and supplement as needed.			
112	FS-14-47	11/14/2014	The Office of Negotiations and Restructuring Actuarial Division should update its Small Plan Bulk Reserve tool to correct the flaws identified by the auditors during the FY 2014 testing.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
113	FS-14-48	11/14/2014	The Office of Negotiations and Restructuring Actuarial Division should promptly correct the two (2) exceptions identified by the auditors during the review performed as of September 30, 2014, which resulted in understatement of multiemployer Probable Small Bulk Reserve (SPBR) and Reasonably Possible SPBR.	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes
114	HRD-17	9/30/2014	In accordance with the CFR and OPM policy, establish written requirements for determining proposed incentive rates for SLR benefits.	Audit Incentive Related to Recruitment, Relocation and Retention	\$0	Yes
115	HRD-18	9/30/2014	Periodically provide information to PBGC managers on 3Rs incentives and SLR including the procedures for nomination, writing justifications, and required supporting documentation.	Audit Incentive Related to Recruitment, Relocation and Retention	\$0	Yes
116	HRD-19	9/30/2014	Improve controls to align SLR and 3Rs service agreements more closely to the CFR and OPM policies, by applying consistent contract language and provisions for similar types of agreements.	Audit Incentive Related to Recruitment, Relocation and Retention	\$0	Yes

117	HRD-20	9/30/2014	Implement controls to make HRD's review and approval process for 3Rs and SLR incentives more substantive.	Audit Incentive Related to Recruitment, Relocation and Retention	\$0	Yes
118	IPD-4	3/31/2005	Develop and implement policies, procedures or other controls to ensure that reconciling items noted in one period are appropriately corrected to prevent them from recurring in future periods.	Fiscal Year 2004 Financial Statement Audit - Management Letter (Financial)	\$0	Yes
119	NRAD-01	2/27/2015	The Office of Negotiations and Restructuring Actuarial Division should remove all records from TeamConnect that do not relate to the existing terminated or at-risk plans.	Fiscal Year 2014 Management Letter	\$0	Yes
120	NRAD-03	2/27/2015	Completing a study, using 5500 data, on plans that do not report premium funding target to confirm that the current assumptions are valid or adjust those assumptions, if necessary. The study should be re-performed if certain critical facts such as policy and data have changed significantly since the last study.	Fiscal Year 2014 Management Letter	\$0	Yes
121	OIT-117R	5/16/2013	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY-2012 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes
122	OIT-118R	5/16/2013	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY-2012 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes

123	OIT-119R	5/16/2013	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY-2012 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes
124	OIT-120R	5/16/2013	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY-2012 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes
125	OIT-121R	5/16/2013	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY-2012 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes
126	OIT-123R	1/9/2014	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY 2013 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes
127	OIT-127R	1/9/2014	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY 2013 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes
128	OIT-128R	1/9/2014	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY 2013 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes

129	OIT-133R	3/30/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY 2014 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes
130	OIT-134R	3/30/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY 2014 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes
131	OIT-135R	3/30/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY2014 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes
132	OIT-138R	3/30/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY 2014 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes
133	OIT-139R	3/30/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY 2014 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes
134	OIT-140R	3/30/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY 2014 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes
135	OIT-141R	3/30/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY 2014 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes

136	OIT-142R	3/30/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY 2014 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes
137	OIT-143R	3/30/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY 2014 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes
138	OIT-144R	3/30/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY2014 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes
139	OIT-145R	3/30/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	FY 2014 Vulnerability Assessment and Penetration Testing Report (RESTRICTED DISCLOSURE)	\$0	Yes
140	OIT-147	8/6/2015	Establish criteria, standards, and definitions to identify cloud service providers and procure vendors with a standard risk-based approach so that cloud contracts are consistently identified and administered in a manner that protects PBGC data.	PBGC Began Developing Methods for Oversight and Administration of Cloud Computing Service Providers - Work is Needed for the Expected Increase in Externally Hosted Systems	\$0	Yes
141	OIT-148	8/6/2015	Establish a multi-disciplinary cloud services procurement team that includes assigning roles and responsibilities to PBGC personnel in IT, procurement, and OGC to monitor purchases so that contracts include clauses needed to protect PBGC information and systems.	PBGC Began Developing Methods for Oversight and Administration of Cloud Computing Service Providers - Work is Needed for the Expected Increase in Externally Hosted Systems	\$0	Yes

142	OIT-149	8/6/2015	Establish, implement and monitor controls which provide reasonable assurance that foreign personnel with access to PBGC data and information systems receive background checks in accordance with PBGC policy and procedures.	PBGC Began Developing Methods for Oversight and Administration of Cloud Computing Service Providers - Work is Needed for the Expected Increase in Externally Hosted Systems	\$0	Yes
143	OIT-150	8/6/2015	Improve controls over monitoring by enforcing review of monthly staffing reports for accuracy and periodic security categorization.	PBGC Began Developing Methods for Oversight and Administration of Cloud Computing Service Providers - Work is Needed for the Expected Increase in Externally Hosted Systems	\$0	Yes
144	ONR-01	3/21/2014	Define, establish and implement a consistently managed program with documented and assigned responsibilities for staff and managers, including key controls such as supervisory review and required standard documentation to ensure agreements are consistently monitored, enforced, and modified under uniform and equitable guidelines.	Increased Oversight, Internal Controls and Performance Accountability Needed for PBGC's Monitoring, Enforcing and Modifying Negotiated Funding Agreements	\$0	Yes
145	ONR-02	3/21/2014	Train applicable staff in newly developed processes and TeamConnect required documentation and ensure periodic management review to ensure effectiveness of established internal controls.	Increased Oversight, Internal Controls and Performance Accountability Needed for PBGC's Monitoring, Enforcing and Modifying Negotiated Funding Agreements	\$0	Yes

146	ONR-03	3/21/2014	Establish policies, procedures and controls which ensure that key decisions made in PBGC meetings are adequately recorded and periodically reviewed by management according to federal records management regulations and PBGC policy.	Increased Oversight, Internal Controls and Performance Accountability Needed for PBGC's Monitoring, Enforcing and Modifying Negotiated Funding Agreements	\$0	Yes
147	ONR-04	3/21/2014	Establish performance measures which reflect the effectiveness of the program and reevaluate data from the negotiated funding agreements in order to determine differences between EWP and 4062€ trends over time, to adequately track the amount of protections achieved through the agreements, amount of modifications and to identify required documentation. Performance measures should meet federal performance standards, PBGC policy, and provide for transparent communication to key stakeholders and plan participants.	Increased Oversight, Internal Controls and Performance Accountability Needed for PBGC's Monitoring, Enforcing and Modifying Negotiated Funding Agreements	\$0	Yes
148	ONR-05	3/21/2014	Ensure that TeamConnect procedures adequately incorporate federal guidance and PBGC policies and procedures for records management, so that staff consistently store, maintain and dispose of federal records.	Increased Oversight, Internal Controls and Performance Accountability Needed for PBGC's Monitoring, Enforcing and Modifying Negotiated Funding Agreements	\$0	Yes
149	ONR-06	3/21/2014	Perform and document annual records management reviews in compliance with Federal standards and PBGC policy. Reassess the file plan to ensure all federal records have been identified.	Increased Oversight, Internal Controls and Performance Accountability Needed for PBGC's Monitoring, Enforcing and	\$0	Yes

				Modifying Negotiated Funding Agreements		
150	ONR-07	3/21/2014	Establish roles within TeamConnect and limit access to the TeamConnect application on a need-to-know basis in accordance with NIST standards and PBGC security standards.	Increased Oversight, Internal Controls and Performance Accountability Needed for PBGC's Monitoring, Enforcing and Modifying Negotiated Funding Agreements	\$0	Yes
151	PBGC-03	11/16/2010	Develop a workforce strategy tailored to address gaps in numbers, deployment, and alignment of the human capital to be obtained through contracts. This strategy, which might incorporate aspects of PBGC's Human Capital Strategy, should reflect the importance of the contract workforce to PBGC and support linkage of staffing and contracting decisions at the corporate level.	Evaluation of PBGC's Strategic Preparations for a Potential Workload Influx	\$0	Yes
152	PBGC-08	11/30/2011	Clarify BAPD procedures to require documentation of the resolution of variances identified as part of plan asset valuations and post-termination participant audits.	PBGC Processing of Terminated United Airlines Pension Plans was Seriously Deficient	\$0	Yes

153	PBGC-13	11/30/2011	Develop a quality event tracking tool to address the risk that training needs are being overlooked, system issues are undocumented or unaddressed, and that performance issues are unaddressed. The tool should include a statement of the issue, population affected, root cause analysis of why the error occurred, event resolution, and appropriate remedial action to limit or reduce recurrence of the event.	PBGC Processing of Terminated United Airlines Pension Plans was Seriously Deficient	\$0	Yes
154	PBGC-14	11/30/2011	Elevate the compliance function for post-termination audits and evaluations to promote objectivity and provide a greater emphasis on compliance with standards and audit / evaluation quality. The unit's organizational placement should encourage independence of thought and action for the compliance unit; until quality issues in BAPD have been resolved, the compliance function should report directly to the highest levels of PBGC management.	PBGC Processing of Terminated United Airlines Pension Plans was Seriously Deficient	\$0	Yes
155	PBGC-20	11/30/2011	As part of the on-going strategic review, develop and implement processes to ensure that post-termination participant audits are done in accordance with applicable standards and in a manner that provides the appropriate level of assurance.	PBGC Processing of Terminated United Airlines Pension Plans was Seriously Deficient	\$0	Yes

156	PRAD-02	1/30/2015	Conduct a strategic review of PRAD's business process, observing and documenting work for all actuarial work products developed by PRAD staff and contractors. PRAD should use the results of the review as a foundation for the QAP Manual, identifying critical control points, which can be used by management to ensure procedures which promote standard application of work and effective quality review, and which ensure identification of all federal records.	PBGC Compliance with MAP-21 Still a Work in Progress	\$0	Yes
157	PRAD-03	1/30/2015	Once business processes are reviewed to identify control points, augment the PRAD QAP Manual and associated documentation to detail steps used in the performance of all modeling and actuarial work, so that actuarial work products can be reproduced and undergo effective and well-documented quality review. The QAP Manual should include review and oversight methods for consistent use and enforcement of procedures, appropriate approval, and escalation of issues identified.	PBGC Compliance with MAP-21 Still a Work in Progress	\$0	Yes
158	PRAD-04	1/30/2015	Provide training to PRAD staff on the use of the Manual and its relationship to any additional procedural documents maintained in the department.	PBGC Compliance with MAP-21 Still a Work in Progress	\$0	Yes
159	PRAD-05	1/30/2015	Modify the PRAD Manual to require that all actuarial work and modeling products are	PBGC Compliance with MAP-21 Still a Work in Progress	\$0	Yes

			completed in accordance with actuarial standards, internal PBGC policies, and federal records management and internal control requirements.			
160	PRAD-06	1/30/2015	PRAD should complete documentation of all records management procedures. The procedures should include clear control points for record retention procedures, identify all storage areas used in the creation, identification and formalization of records, ensure File Plan integration, and establish supervisory quality checks. All staff and contractors should receive training on finalized procedures, and annually thereafter.	PBGC Compliance with MAP-21 Still a Work in Progress	\$0	Yes
161	PRAD-07	1/30/2015	To manage ad hoc requests, PRAD should develop, implement and monitor documented procedures that designate responsibility for a centralized repository, which at minimum documents the incoming request, date received, to whom assigned, requestor, resolution of response, supervisory review, and completion date.	PBGC Compliance with MAP-21 Still a Work in Progress	\$0	Yes
162	PRAD-08	1/30/2015	PRAD should work with WSD and OIT to assess and implement access controls for actuarial information throughout the entire actuarial reporting process, and incorporate where actuarial records are created, developed and identified, in accordance with federal regulations and PBGC policies and procedures.	PBGC Compliance with MAP-21 Still a Work in Progress	\$0	Yes

163	WSD-01	1/30/2015	PBGC should continue to have WSD perform independent Records Management Reviews in accordance with its NARA reviewed procedures manual and require departments to take action on the findings. If the agency determines that findings are not feasible, it should provide WSD with a documented explanation of risk acceptance.	PBGC Compliance with MAP-21 Still a Work in Progress	\$0	Yes
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