



Office of Inspector General  
Pension Benefit Guaranty Corporation

May 2, 2016

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 requested enhanced reporting to the committees and reiterated your continuing efforts to support the Inspector General community in protecting taxpayers against waste, fraud and abuse.

**I provide this information for the period October 1, 2015 through March 31, 2016.** 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 implemented 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 100 open OIG recommendations as of March 31, 2016, and the additional information you request. The agency agreed with all recommendations.

Our office has no open 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. However, please seek whistleblower consent before revealing any whistleblower's personally identifiable information to Congress.***

We have no responsive records.

5. ***Detailed descriptions of any attempts to interfere with IG independence, including:***
  - c. ***Restricting communications between the IG office and Congress; and***
  - d. ***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 of 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 such as our vulnerability assessment and penetration testing report and the template report required by the Office of Management and Budget for compliance with the Federal Information Security Modernization Act (FISMA). We also limit disclosure of those reports within PBGC to those with a need to know.

I note that we do “disclose” that we have conducted the work reported in the few restricted disclosure and other non-public audit/evaluation reports; in lieu of posting full text reports, we post a high-level summary on our website and also summarize each in our Semiannual Reports to Congress.

Attachment 2 is a table summarizing the three reports issued between October 1, 2015 – March 31, 2016 that are not in full text on our website – two IT vulnerability assessment and penetration testing restricted-disclosure reports and one FISMA template report.

Investigative Reports. We do not post detailed descriptions of investigations or any investigative reports on our website due to privacy concerns. To provide necessary information for a prosecutor (criminal) or the agency (administrative) to consider appropriate action, 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.

Attachment 3 provides a table with the requested data concerning closed investigations.

PBGC OIG Letter to Senators Johnson and Grassley  
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In closing, our office will continue in our efforts to increase efficiency, improve PBGC operations, and prevent waste, fraud and abuse. I would be happy to discuss our efforts with you and answer any additional questions at your convenience. You may also read our reports at 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 at 202 326-4000 extension 3437.

Respectfully submitted,

A handwritten signature in black ink that reads "Robert A. Westbrook". The signature is written in a cursive style with a large initial "R".

Robert 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 March 31, 2016**

	Recommendation Number	Date Issued	Recommendation	Report Title	Potential Cost Savings	Agency Agreement
1	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
2	BAPD-133	3/4/2016	ASD should execute a new study for determining the guaranteed factor for multiemployer plans that considers the following: 1. The sample of plans used to determine the guaranteed factor should be representative of the broad spectrum/population of plans to which the guaranteed factor methodology will be applied. For example, samples from each of the plan categories should be included: a. Terminated b. Insolvent c. Ongoing d. Probable e. Possible 2. The sample should be randomly selected and cover a credible portion of the block as measured by present values as a specific point in time (e.g. September 30, 2015). 3. The study should include a critical review of the current process and determine whether an alternative approach would be more appropriate. 4. Any averages developed as part of the study's	Fiscal Year 2015 Financial Statement Audit Management Letter Report	\$0	Yes

			recommendations should be weighted by benefit present values. 5. The study's recommendations should be tested against the sample to ensure their suitability. For example, the resulting guaranteed factors should replicate the actual guaranteed ratios of the sample within a reasonable measure of precision.			
3	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
4	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
5	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	Fiscal Year 2014 Management Letter	\$0	Yes

			addressing the operational effectiveness of those controls.			
6	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
7	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
8	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
9	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
10	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
11	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
12	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

13	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
14	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
15	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
16	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
17	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
18	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



19	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
20	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
21	FISMA-15-01	2/19/2016	Fully implement Splunk Enterprise in PBGC, including its SIEM capability.	Fiscal Year 2015 Federal Information Security Modernization Act Final Report	\$0	Yes
22	FISMA-15-02	2/19/2016	Require system owners to fully implement Splunk Enterprise for PBGC major applications.	Fiscal Year 2015 Federal Information Security Modernization Act Final Report	\$0	Yes
23	FISMA-15-03	2/19/2016	Ensure the consistent use of the Event Analysis Checklist as part of the event analysis process.	Fiscal Year 2015 Federal Information Security Modernization Act Final Report	\$0	Yes
24	FISMA-15-04	2/19/2016	PBGC should remove native FTP from any remaining systems.	Fiscal Year 2015 Federal Information Security Modernization Act Final Report	\$0	Yes
25	FISMA-15-05	2/19/2016	Perform scheduled credentialed scans to include all the systems and update PBGC policies and procedures to require regular credentialed scans.	Fiscal Year 2015 Federal Information Security Modernization Act Final Report	\$0	Yes

26	FISMA-15-06	2/19/2016	PBGC ensures that password and account lockout settings for databases are updated to be consistent with PBGC requirements identified in the PBGC Identification and Authentication Standard (SE-STD-01-27) and PBGC Access Control Standard (SE-STD-01-32).	Fiscal Year 2015 Federal Information Security Modernization Act Final Report	\$0	Yes
27	FISMA-15-07	2/19/2016	Evaluate existing controls and determine effectiveness to ensure annual security control assessments are timely completed for all major applications and general support systems.	Fiscal Year 2015 Federal Information Security Modernization Act Final Report	\$0	Yes
28	FISMA-15-08	2/19/2016	PBGC should increase records management controls and monitoring to ensure all required personnel timely complete role-based training.	Fiscal Year 2015 Federal Information Security Modernization Act Final Report	\$0	Yes
29	FOD-400	3/4/2016	PBGC should design analytical tools (automated or manual) to identify unusual trends and anomalies in the assigned values of investment securities. Management should follow up quarterly on these procedures to ensure they are performed and are effective, ensuring that net asset values are appropriate.	Fiscal Year 2015 Financial Statement Audit Management Letter Report	\$0	Yes
30	FS-07-07	11/15/2007	Recommendation text omitted to protect exploitation of vulnerability; report is limited disclosure.	<b>Limited Disclosure</b> Report on Internal Controls-PBGC's FY 2007 and 2006 Financial Statements Audit	\$0	Yes
31	FS-07-08	11/15/2007	Recommendation text omitted to protect exploitation of vulnerability; report is limited disclosure.	<b>Limited Disclosure</b> Report on Internal Controls-PBGC's FY 2007 and 2006 Financial Statements Audit	\$0	Yes

32	FS-07-10	11/15/2007	Recommendation text omitted to protect exploitation of vulnerability; report is limited disclosure.	<b>Limited Disclosure</b> Report on Internal Controls-PBGC's FY 2007 and 2006 Financial Statements Audit	\$0	Yes
33	FS-07-12	11/15/2007	Recommendation text omitted to protect exploitation of vulnerability; report is limited disclosure.	<b>Limited Disclosure</b> Report on Internal Controls-PBGC's FY 2007 and 2006 Financial Statements Audit	\$0	Yes
34	FS-07-14	11/15/2007	Recommendation text omitted to protect exploitation of vulnerability; report is limited disclosure.	<b>Limited Disclosure</b> Report on Internal Controls-PBGC's FY 2007 and 2006 Financial Statements Audit	\$0	Yes
35	FS-07-17	11/15/2007	Recommendation text omitted to protect exploitation of vulnerability; report is limited disclosure.	<b>Limited Disclosure</b> Report on Internal Controls-PBGC's FY 2007 and 2006 Financial Statements Audit	\$0	Yes
36	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
37	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 value based on the method that most accurately reflects fair market value.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2011 and 2010 Financial Statement	\$0	Yes

38	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
39	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
40	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
41	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
42	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

43	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
44	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
45	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
46	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
47	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
48	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.			
49	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
50	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
51	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
52	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

53	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
54	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
55	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
56	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	Report of Internal Controls related to the PBGC's Reporting for FY 2014 and FY 2013 Financial Statements Audit	\$0	Yes

			errors are identified and corrected within the same accounting period.			
57	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
58	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
59	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
60	FS-15-01	11/13/2015	Investigate the cause underlying the IPVFB valuation of the terminated recoupment and include the correction of that flaw to the IPVFB modernization project.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2015 and 2014 Financial Statement Audit	\$0	Yes
61	FS-15-02	11/13/2015	Complete the PBGC RMF transition, fully implement the entity-wide information security risk management program and provide periodic updates to stakeholders.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2015 and 2014 Financial Statement Audit	\$0	Yes
62	FS-15-03	11/13/2015	Complete the migration to NIST SP 800-53, Revision 4, Security and Privacy Controls for Federal Information Systems and Organizations and provide periodic updates to stakeholders.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2015 and 2014 Financial Statement Audit	\$0	Yes
63	FS-15-04	11/13/2015	Complete the implementation of NIST SP 800-53, Revision 4 controls for common controls,	Report on Internal Controls Related to the Pension Benefit Guaranty	\$0	Yes



			remediation of common controls weaknesses, and make available to system owners in Cyber Security Assessment and Management for appropriate inclusion in their system security plans.	Corporation's Fiscal Year 2015 and 2014 Financial Statement Audit		
64	FS-15-05	11/13/2015	FOD should develop controls to ensure changes in PPS are properly tested prior to being placed in production, including controls to confirm: (1) PBGC's change control processes are followed, and (2) system requirements and design changes are fully documented.	Report on Internal Controls Related to the Pension Benefit Guaranty Corporation's Fiscal Year 2015 and 2014 Financial Statement Audit	\$0	Yes
65	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		
66	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
67	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
68	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
69	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

70	NRAD-04	3/4/2016	Determine an estimation method that will be able to approximate the liability for future years for plans that do not report complete information in their premium filing.	Fiscal Year 2015 Financial Statement Audit Management Letter Report	\$0	Yes
71	NRAD-05	3/4/2016	Complete a study, using 5500 data, on plans that do not report premium funding target to confirm that the current assumptions are valid and adjust those assumptions, if necessary.	Fiscal Year 2015 Financial Statement Audit Management Letter Report	\$0	Yes
72	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 <b>(RESTRICTED DISCLOSURE)</b>	\$0	Yes
73	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 <b>(RESTRICTED DISCLOSURE)</b>	\$0	Yes
74	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 <b>(RESTRICTED DISCLOSURE)</b>	\$0	Yes
75	OIT-123R	1/9/2014	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	Fiscal Year 2013 Vulnerability Assessment and Penetration Testing Report <b>(RESTRICTED DISCLOSURE)</b>	\$0	Yes
76	OIT-128R	1/9/2014	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	Fiscal Year 2013 Vulnerability Assessment and Penetration Testing Report <b>(RESTRICTED DISCLOSURE)</b>	\$0	Yes
77	OIT-133R	3/30/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	OITs Fiscal Year 2014 Vulnerability Assessment and Penetration Testing Report <b>(RESTRICTED DISCLOSURE)</b>	\$0	Yes

78	OIT-138R	3/30/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	OITs Fiscal Year 2014 Vulnerability Assessment and Penetration Testing Report <b>(RESTRICTED DISCLOSURE)</b>	\$0	Yes
79	OIT-139R	3/30/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	OITs Fiscal Year 2014 Vulnerability Assessment and Penetration Testing Report <b>(RESTRICTED DISCLOSURE)</b>	\$0	Yes
80	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
81	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
82	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

83	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
84	OIT-151	12/11/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	Fiscal Year 2015 Vulnerability Assessment and Penetration Testing Report <b>(RESTRICTED DISCLOSURE)</b>	\$0	Yes
85	OIT-152	12/11/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	Fiscal Year 2015 Vulnerability Assessment and Penetration Testing Report <b>(RESTRICTED DISCLOSURE)</b>	\$0	Yes
86	OIT-153	12/11/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	Fiscal Year 2015 Vulnerability Assessment and Penetration Testing Report <b>(RESTRICTED DISCLOSURE)</b>	\$0	Yes
87	OIT-154	12/11/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	Fiscal Year 2015 Vulnerability Assessment and Penetration Testing Report <b>(RESTRICTED DISCLOSURE)</b>	\$0	Yes
88	OIT-155	12/11/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	Fiscal Year 2015 Vulnerability Assessment and Penetration Testing Report <b>(RESTRICTED DISCLOSURE)</b>	\$0	Yes
89	OIT-156	12/11/2015	Recommendation text omitted to protect exploitation of vulnerability; report is restricted disclosure.	Fiscal Year 2015 Vulnerability Assessment and Penetration Testing Report <b>(RESTRICTED DISCLOSURE)</b>	\$0	Yes

90	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 decision at the corporate level.	Evaluation of PBGC's Strategic Preparations for a Potential Workload Influx	\$0	Yes
91	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
92	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, 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
93	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

94	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
95	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
96	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
97	PRAD-05	1/30/2015	Modify the PRAD Manual to require that all actuarial work and modeling products are completed in accordance with actuarial standards, internal PBGC policies, and federal records management and internal control requirements.	PBGC Compliance with MAP-21 Still a Work in Progress	\$0	Yes

98	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
99	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
100	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

**Attachment 2: Summary of Audit/ Evaluation Reports Not in Full Text on Our Website  
 From October 1, 2015 – March 31, 2016**

Report Number	Report Title	Issue Date	Summary
EVAL-2015-7/ FA-14-101-6	Fiscal Year 2014 Vulnerability Assessment and Penetration Testing Report	3/30/2015 Restricted Disclosure	This review is conducted annually to find technical weaknesses in PBGC's computer systems that may allow employees/contractors or outsiders to cause harm to and/or impact PBGC's business processes and information.
LTR 2016-4/ FA-15-108-4	FY 2014 FISMA Submission to OMB	11/13/15-- template report not posted	Annually, agencies and OIGs must complete and submit answers to a series of template questions about management and oversight an agency's IT program, covering such topics as appropriate policies and procedures, security over data (including access controls, configuration management, effective training, and incident response), and continuous monitoring. The agency head and Inspector General jointly submit the template to OMB, along with an individual letter from each. We post the IG letter. Subsequently, we prepare an annual narrative FISMA report that is publicly available on our website.
VAL-2016-1/ FA-15-108-1	Fiscal Year 2015 Vulnerability Assessment and Penetration Testing Report	12/11/2015 Restricted Disclosure	This review is conducted annually to find technical weaknesses in PBGC's computer systems that may allow employees/contractors or outsiders to cause harm to and/or impact PBGC's business processes and information.



**Attachment 3: Summary of Closed Investigations Not Disclosed to Public  
 October 1, 2015 - March 31, 2016**

<b>Investigation Number</b>	<b>Disposition</b>	<b>Allegation Summary</b>	<b>Date Closed</b>
15-0018-I	Closed-No Referral	Other	10/5/2015
15-0042-I	Closed-No OIG Investigation	Benefit Theft From Someone Deceased	10/5/2015
15-0045-I	Closed-No Referral	Other	10/9/2015
14-0016-I	Closed-No Referral	Employee Integrity	10/9/2015
15-0032-I	Closed-No Referral	Benefit Theft From Someone Deceased	10/28/2015
16-0003-I	Closed-Administrative Referral, No Action Taken	Employee Integrity	12/4/2015
15-0019-I	Closed-Criminal Referral, Declined	Employee Integrity	2/24/2016
16-0004-I	Closed-No Referral	Benefit Theft From Someone Alive	2/24/2016
16-0010-I	Closed-No OIG Investigation	Participant Benefit Irregularities	2/24/2016
16-0007-I	Closed-No Referral	Employee Integrity	3/4/2016
14-0002-I	Closed-No OIG Investigation	Benefit Theft From Someone Deceased	3/23/2016
15-0035-I	Closed-No Referral	Benefit Theft From Someone Deceased	3/23/2016
15-0037-I	Closed-Administrative Referral, No Action Taken	Participant Benefit Irregularities	3/23/2016