DATE: December 21, 2018

TO: Chairman

FROM: Inspector General


In accordance with Federal Information Security Management Act (FISMA), the FCC Office of Inspector General (OIG) engaged Kearney and Company, P.C. (Kearney) to evaluate the Commission's progress in complying with the requirements of FISMA. Specifically, the evaluation tested the effectiveness of information security policies, procedures and practices for a representative subset of the FCC's information systems; and made a limited assessment of the information security practices at Universal Service Administrative Company (USAC), the administrator of the FCC Universal Service Fund. Kearney also evaluated FCC and USAC's compliance with Department of Homeland Security reporting requirements, Office of Management and Budget policies, and National Institute of Standards and Technology guidance relevant to FISMA. Additionally, Kearney followed up on findings and recommendations reported in previous FISMA evaluations to determine whether the FCC and USAC properly mitigated identified risks.

The attached Kearney report combines instances of noncompliance noted during the evaluation into 9 findings and offers 19 recommendations intended to improve the effectiveness of the FCC's information security program controls. Five of the nine findings address security weaknesses that were also reported in prior years. While the FCC has improved its information security program since FY 2017, Kearney noted that six of the eight FISMA metric domains warrant additional management attention to address deficiencies and attain a more mature information security posture. USAC made efforts to improve compliance with FISMA by enhancing their risk management program, but Kearney found that USAC still had control deficiencies in this area, as well as the identity and access management program.

Kearney is wholly responsible for the attached report and the conclusions expressed therein. The OIG provided the draft findings and recommendations to FCC management and subsequently, management provided a written response, which is included in its entirety as an appendix to Kearney's final report. The OIG monitored Kearney's performance throughout the audit and reviewed their report and related documentation. Our review did not disclose any instances
where Kearney did not comply in all material respects with generally accepted government auditing standards.

If you have any questions, please contact Robert McGriff, Assistant Inspector General for Audit at (202) 418-0483; or Sophila Jones, Deputy Assistant Inspector General for Audits, Operations, Financial and Information Technology Division at (202) 418-1655.

cc: Managing Director
Deputy Managing Director
Chief Information Officer/Deputy CIO
Chief Financial Officer
Chief Information Security Officer