

December 23, 2005

MEMORANDUM TO: Luis A. Reyes  
Executive Director for Operations

Jesse L. Funches  
Chief Financial Officer

FROM: Stephen D. Dingbaum/**RA**/  
Assistant Inspector General for Audits

SUBJECT: STATUS OF RECOMMENDATIONS: SYSTEM  
EVALUATION OF THE FEE SYSTEMS  
(OIG-04-A-23)

REFERENCE: DEPUTY CHIEF FINANCIAL OFFICER  
MEMORANDUM DATED DECEMBER 1, 2005

Attached is the Office of the Inspector General's analysis and status of recommendations as discussed in the agency's response dated December 1, 2005. Recommendation 2 is closed and recommendations 1, 3, and 4, remain resolved. Please provide an updated status of the resolved recommendations by June 8, 2006.

If you have any questions or concerns, please call me at 415-5915.

Attachment: As stated

cc: W. Dean, OEDO  
M. Malloy, OEDO  
P. Tressler, OEDO

Document Location: G:\AUDIT\04-a-23\120705followup.doc

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## Audit Report

### System Evaluation of the Fee System

OIG-04-A-23

#### Status of Recommendations

Recommendation 1: Update the Fee Systems Security Plan to describe all controls currently in place. In-place controls are those marked at least at Level 3 in the self-assessment, and that were documented as passed in the last Security Test and Evaluation Plan and Report or in any test and evaluation on controls added since publication of that report.

Response Dated

December 1, 2005: The update to the Fee Systems Security Plan is part of the Fee Systems re-certification and re-accreditation. We now have contractor support available through an Office of Information contract and work is proceeding. The current milestone schedule indicates that the system security plan will be completed and provided to OIS for their review and accreditation prior to the May 30, 2006, expiration of authority to operate.

OIG Response: The proposed corrective action addresses the intent of this recommendation. This recommendation will be closed when OIG receives and evaluates the contents of the updated Fee Systems Security Plan.

**Status:** Resolved.

## Audit Report

### System Evaluation of the Fee System

OIG-04-A-23

#### Status of Recommendations

Recommendation 2: Update the Fee Systems self-assessment to reflect controls in place. In-place controls are those that were documented as passed in the last Security Test and Evaluation Plan and Report or in any test and evaluation on controls added since publication of that report.

Response Dated  
December 1, 2005: Completed as of September 12, 2005. Attached is a copy of the annual self-assessment for the Fee Systems.

OIG Response: OIG reviewed the annual self assessment for the Fee Systems. The corrective action addressed the intent of this recommendation

**Status:** Closed.

## Audit Report

### System Evaluation of the Fee System

OIG-04-A-23

#### Status of Recommendations

Recommendation 3: Keep copies of the As-Built System Documentation in the same location as the Fee Systems Business Continuity Plan to facilitate access during disaster recovery.

Response Dated

December 1, 2005: My April 6, 2005, status report on OIG-04-A-23 indicated that the work on Recommendation 3 was completed as of December 29, 2004. Your April 21, 2005, response stated that the recommendation would be closed when OIG verifies that the Fee Systems As-Built Documentation and User Guides have been co-located with the Fee Systems Business Continuity Plan and other security documentation in ADAMS.

OIG Response: OIG reviewed the location of the As-Built System Documentation from an ADAMS screen print. However, this was not sufficient corrective action to address the intent of OIG's recommendation.

When the evaluation was conducted, the As-Built System Documentation was stored in the Central Configuration Management (CCM) library on a configuration management (CM) server. To verify that all the appropriate documents are in ADAMS, we need to see the documents contained in the CCM library. A screen print is needed from the CCM that shows all the application artifacts that include dates for the documents, so we can verify that ADAMS and the CCM library contain the same versions of the documents. The documents have no version numbers or dates in their titles, so we need to verify that the documents are current. The ADAMS screen print should also include dates to verify that ADAMS contains the appropriate As-Built System Documentation.

## Audit Report

### System Evaluation of the Fee System OIG-04-A-23 Status of Recommendations

#### Recommendation 3 continued

Furthermore, the Fees Systems include a total of 10 individual systems. The screen print only shows As-Built System Documentation for 8. Missing are FACANN and FEESET. There should be As-Built System Documentation for these, or a discussion as to why documentation does not exist for these systems.

**Status:** Resolved.

## Audit Report

### System Evaluation of the Fee System

OIG-04-A-23

#### Status of Recommendations

Recommendation 4: Update the Fee Systems Business Continuity Plan to include the following changes:

- Record modifications to the plan in a record of changes to include what changes were made (e.g., the page numbers or section numbers where the changes were made), why the changes were made (e.g., annual update or update during re-accreditation), and date of change.
- Include an order of succession that identifies personnel responsible to assume authority for executing the contingency plan in the event the designated person is unavailable or unable to do so.
- Include a description of the overall structure of contingency teams, including the hierarchy and coordination mechanisms and requirements among the teams. The description should include an overview of team member roles and responsibilities in a contingency situation. Teams and team members should be designated for specific response and recovery roles during contingency plan activation.
- Describe the methods used to notify recovery personnel during business and non-business hours.
- Include more detailed steps for recovery actions and assign procedures to the appropriate recovery team(s).
- Include procedures for restoring system operations, with a focus on how to clean the alternate site of any equipment or other materials belonging to the organization.

Response Dated  
December 1, 2005:

The update to the Fee Systems Business Continuity Plan is part of the Fee Systems re-certification and re-accreditation. We now have contractor support available through an OIS contract and work is proceeding. The current milestone schedule indicates

## Audit Report

### System Evaluation of the Fee System

OIG-04-A-23

### Status of Recommendations

#### Recommendation 4, continued

that the Business Continuity Plan will be completed and provided to OIS for their review and accreditation prior to the May 30, 2006, expiration of authority to operate.

OIG Response: The proposed corrective action addresses the intent of this recommendation. This recommendation will be closed when OIG receives and evaluates the updated Fee Systems Business Continuity Plan.

**Status** Resolved.