



MEMORANDUM

DATE: June 10, 2025

TO: Mary J. Buhler
Executive Director of Operations

FROM: Hruta Virkar, CPA /**RA**/
Assistant Inspector General for Audits & Evaluations

SUBJECT: STATUS OF RECOMMENDATIONS: AUDIT OF THE
DEFENSE NUCLEAR FACILITIES SAFETY BOARD'S
IMPLEMENTATION OF THE FEDERAL INFORMATION
SECURITY MODERNIZATION ACT OF 2014 FOR FISCAL
YEAR 2019 (DNFSB-20-A-05)

REFERENCE: OFFICE OF THE EXECUTIVE DIRECTOR OF
OPERATIONS, EMAIL CORRESPONDENCE DATED
JUNE 2, 2025

Attached is the Office of the Inspector General's (OIG) analysis and status of recommendations based on the email correspondence dated June 2, 2025. Based on this response, recommendation 5 is now closed. Recommendations 1, 2, 3a, 4, and 6-10 were previously closed. Recommendations 3 b-d and 11 remain open and resolved. Please provide an updated status of the open, resolved recommendations by December 5, 2025.

If you have any questions or concerns, please call me at 301.415.1982 or Mike Blair, Team Leader, at 301.415.8399.

Attachment:
As stated

cc: K. Herrera, DEDO
J. Biggins, DEDRS
G. Garvin, DEDRS

Audit Report
AUDIT OF THE DEFENSE NUCLEAR FACILITIES SAFETY BOARD'S
IMPLEMENTATION OF THE FEDERAL INFORMATION SECURITY
MODERNIZATION ACT OF 2014 FOR FISCAL YEAR 2019
Status of Recommendations
(DNFSB-20-A-05)

Recommendation 3: Using the results of recommendations one (1) and two (2) above:

- b. Collaborate with Defense Nuclear Facilities Safety Board (DNFSB) Cybersecurity Team Support to establish performance metrics in service level agreements to measure, report on, and monitor the risks related to contractor systems and services being monitored by Cybersecurity Team.
- c. Establish performance metrics to more effectively manage and optimize all domains of the DNFSB information security program.
- d. Implement a centralized view of risk across the organization.

Agency Response
Dated June 2, 2025:

As of June 2, 2025, DNFSB did not provide an updated response pertaining to recommendation 3b, 3c, and 3d. However, the agency provided an update to the target completion date.

Estimated Target Completion Date: Fiscal Year (FY) 2025

OIG Analysis:

The OIG will close this recommendation after confirming that the agency has established performance metrics in service level agreements to measure, report on, and monitor the risks related to contractor systems and services being monitored by the Cybersecurity Team. Additionally, the OIG will verify evidence that demonstrates the agency has established performance metrics to manage and optimize all domains of the agency's information security program more effectively and has implemented a centralized view of risk across the organization.

Status:

Open: Resolved

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MODERNIZATION ACT OF 2014 FOR FISCAL YEAR 2019
Status of Recommendations
(DNFSB-20-A-05)

Recommendation 5: Management should re-enforce requirements for performing DNFSB's change control procedures in accordance with the agency's Configuration Management (CM) Plan by defining consequences for not following these procedures and conducting remedial training as necessary.

Agency Response
Dated June 2, 2025:

The DNFSB has revised its CM Plan to include a requirement for remedial training and consequences for failure to follow the appropriate processes. This document is currently under review. Key supporting documentation was provided to the Auditor. DNFSB request closure of this recommendation, based on the status update and documentation provided.

OIG Analysis:

During the fieldwork phase of the Audit of the DNFSB's Implementation of the Federal Information Security Modernization Act of 2014 (FISMA) for Fiscal Year 2025, the OIG and its contractors had a discussion with the DNFSB on its prior years' outstanding FISMA recommendations. The OIG verified that the DNFSB has revised its CM Plan to include a requirement for remedial training and consequences for failure to follow the appropriate processes. The CM Operating Procedure and CM Plan identify that the DNFSB has incorporated requirements for remedial training. The agency's corrective actions appear reasonable and meet the intent of the recommendation. This recommendation is now closed.

Status: Closed

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MODERNIZATION ACT OF 2014 FOR FISCAL YEAR 2019
Status of Recommendations
(DNFSB-20-A-05)

Recommendation 11: Based on the results of DNFSB's supply chain risk assessment included in the recommendation for the Identify function above, update DNFSB's contingency planning policies and procedures to address Information and Communication Technology (ICT) supply chain risk.

Agency Response
Dated June 2, 2025: As of June 2, 2025, DNFSB did not provide an updated response pertaining to recommendation 11. However, the agency provided an update to the target completion date.

Estimated Target Completion Date: FY 2025, Quarter 4

OIG Analysis: The OIG will close this recommendation after confirming that the agency has updated its contingency planning policies and procedures to address ICT supply chain risk based on the results of the agency's supply chain risk assessment.

Status: Open: Resolved