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Inspector General
Federal Election Commission
999 E Street, NW,
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In response to your request, we performed additional audit tests to determine whether agency officials had implemented corrective actions relating to six recommendations from our 2013 financial statement audit, and whether these actions were sufficient to consider the recommendations closed.

We performed our audit work during the period December 1 through December 5, 2014, at the Federal Election Commission (FEC) offices. We completed our follow-up testing for five of the six recommendations. For these five recommendations, we determined that the actions taken by FEC officials were sufficient to consider them closed. As agreed with members of your staff, we completed supporting working papers and filed them on the FEC network. We also retained a copy of these working papers.

We were not able to complete sufficient tests to close out recommendation 19. FEC experienced a network outage for over one and a half days which prohibited access to the agency's network. As a result, FEC personnel could not provide the data requested when due at noon on December 3rd. However, the data was subsequently provided in the afternoon of December 5th. We attempted to make a determination on this recommendation from the data provided but needed additional information to support a determination as to whether the recommendation could be closed, such as documentation to support corrections of prior scanning vulnerabilities. Therefore, recommendation 19 will remain open and the additional documentation will be requested during the audit-follow up period for the agency's fiscal year 2015 audit.

The table on the following page summarizes the recommendations reviewed, the actions taken by FEC officials, and our conclusions on these recommendations.

We appreciate the courtesies and cooperation provided by FEC personnel during this review.

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## RECOMMENDATIONS REVIEWED

| Rec. No. | Audit Recommendation | Summary of Actions Taken by FEC | Audit Conclusions |
|---|---|---|---|
| 7 | Revise all pertinent FEC policies and procedures to ensure that they address proper prevention and detection controls, and provide a current and authoritative control structure for addressing APT, and other types of intrusions. Ensure that this review is completed, and policies and procedures are issued by March 2014. | FEC issued several new policies and procedures, and updated others that provide appropriate guidance on detection, prevention, and eradication of APT and malware. | We analyzed the documentation provided by FEC on this recommendation, and concluded that actions taken were sufficient to close this recommendation. |
| 12 | Revise FEC policies and operating procedures to require the minimum best practices controls contained in the Federal Desktop Core Configuration (FDCC) and the United States Government Configuration Baseline (USGCB) for those systems that require user identification and passwords. | FEC issued a new procedure, and updated another that noted that the agency has adopted the USGCB configuration standards as the core set of configuration standards for the agency. | We analyzed the documentation provided by FEC on this recommendation, and concluded that actions taken were sufficient to close this recommendation. |
| 13 | Undertake a comprehensive review of user accounts that have been granted nonexpiring passwords. Require detailed information from account owners on the need for non-expiring accounts, including the development of other alternatives, before reauthorizing the accounts' access. Develop FEC policies and operating procedures to implement this recommendation. | FEC undertook a review of accounts with nonexpiring passwords, and established new procedures that require all accounts that use passwords to have passwords that expire. New policies have been issued to provide guidance in this area. | We analyzed the documentation provided by FEC on this recommendation, and concluded that actions taken were sufficient to close this recommendation. |
| 14 | Whenever possible, require accounts with non-expiring passwords to be changed at least annually. Establish substantially more robust password requirements for accounts granted non-expiring passwords. Develop FEC policies and operating procedures to implement this recommendation. | FEC has established procedures relating to service accounts that require the accounts to have passwords that expire every 180 days. As discussed for recommendation 13, FEC has issued guidance in this area. | We analyzed the documentation provided by FEC on this recommendation, and concluded that actions taken were sufficient to close this recommendation. |
| 15 | Immediately terminate those accounts with non-expiring passwords that have not accessed their accounts within the last 12 months. Develop FEC policies and operating procedures to implement this recommendation to include a data retention policy for historical data. | FEC disabled any account that was inactive for 12 months, and as discussed above now requires these accounts to have passwords that expire in 180 days. Procedures have been issued as discussed for recommendation 13. | We analyzed the documentation provided by FEC on this recommendation, and concluded that actions taken were sufficient to close this recommendation. |
| 19 | Strengthen controls to ensure that vulnerabilities/weaknesses identified through the vulnerability scanning tests are completed within 60 days of identification, or document an analysis and acceptance of risks for longer term remediation. | Network problems for one and one-half days, due to issues with one of the agency's contractors, prevented FEC from providing information on our initial data request related to this recommendation until after LSC departed FEC offices. | Due to not receiving the requested documentation until late December 5, we could not complete our testing of this recommendation as further information was needed. Therefore, we were unable to determine whether the recommendation could be closed. |