Open Recommendations
From OIG Internal Audit Reports
As Of September 30, 2017

The Department reports internal audit recommendations as either (1) **unresolved** when the OIG and the Department have not reached agreement on corrective actions in response to the report's recommendations, (2) **resolved** when OIG and Department management agree on action to be taken, (3) **completed** when the responsible Department office indicates that the corrective action have been implemented, or (4) **closed** when the Office of the Chief Financial Officer verifies supporting documentation showing that all corrective actions have been implemented and issues a closure memo. Links to each report provided. Acronyms defined on page (14) as well as in each report.

Audit Report Title (Number) Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
FSA Oversight of the Development and Enhancement of Information Technology Products (A04O0014)				
We recommend that the Chief Operating Officer of FSA establish accountability mechanisms, such as assigning a specific office or official, to ensure FSA follows LMM for all IT projects.	Resolved	6/30/2016	8/4/2016	FSA
We recommend that the Chief Operating Officer of FSA conduct an inventory of IT projects across FSA to establish a complete universe of IT projects.	Resolved	6/30/2016	8/4/2016	FSA
We recommend that the Chief Operating Officer of FSA ensure all projects are entered into EPPM and managed using LMM after establishing a complete universe of IT projects.	Resolved	6/30/2016	8/4/2016	FSA
We recommend that the Chief Operating Officer of FSA update the LMM process as applicable to establish controls and assign responsibility to provide assurance that project teams timely conduct technical and management reviews for IT projects.	Resolved	6/30/2016	8/4/2016	FSA
We recommend that the Chief Operating Officer of FSA maintain required documentation to support compliance with LLM.	Resolved	6/30/2016	8/4/2016	FSA
Misuse of FSA ID and the Personal Authentication Service (X21Q0001)				
Revise the terms and conditions in the FSA ID account creation process to specifically address unauthorized access by commercial third-party users.	Completed	9/26/2016	11/4/2016	FSA
Revise the plain language instructions in the FSA ID account creation process to warn about predatory third-party debt relief companies that request a person's FSA ID.	Completed	9/26/2016	11/4/2016	FSA
Revise the PAS logon banner for the FSA ID to reflect the suggested banner language concerning unauthorized access. FSA should use a 'click-through' or 'pop up' so the user would have to take an overt action to consent to monitoring and could not say that they did not see the language before logging into an FSA system.	Resolved	9/26/2016	11/4/2016	FSA

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Implement a proactive monitoring schedule to analyze trends related to FSA ID accounts and transactions including account creations, logons, and changes; and report any suspicious activity to the Department of Education's Computer Incident Response Capability and the OIG.	Resolved	9/26/2016	10/27/2016	FSA
Take appropriate administrative action against companies or individuals that are abusing or misusing the terms and conditions for the FSA ID.	Resolved	9/26/2016	10/27/2016	FSA
Enable the PAS audit logs to retain previous account information or values before a user updates his or her FSA ID account.	Completed	9/26/2016	10/27/2016	FSA
Final Independent Auditor's Report Fiscal Years 2016 and 2015 Financial Statements Federal Student Aid (A17Q0002)				
We recommend FSA's Chief Information Officer work with the Department CIO to ensure the update, review, approval and dissemination of the Information Assurance/ Cybersecurity Policy and associated guidance is completed in order to comply with NIST standards and OMB guidance.	Resolved	11/14/2016	1/26/2017	FSA
We recommend that the FSA Chief Operating Officer continue to execute the corrective actions as outlined in FSA's project plan to comply with the timing requirement for the referral of delinquent non-tax debts.	Resolved	11/14/2016	2/13/2017	FSA
We recommend the Chief Operating Officer request the necessary information on the Department's modeling activities and perform a comprehensive risk assessment of the Department's modeling on FSA's mission in connection with the development of FSA's enterprise risk management program.	Resolved	11/14/2016	1/17/2017	FSA
We recommend FSA's Chief Information Officer work with the Department CIO to design and implement controls over the handling of Department security and privacy incidents to ensure their resolution is properly documented.	Resolved	11/14/2016	1/26/2017	FSA
We recommend the FSA Chief Financial Officer support the Director, Budget Service in their effort to document the Department's process, policies and procedures for the design, development, testing and authorization of new models.	Resolved	11/14/2016	1/17/2017	FSA
We recommend FSA's Chief Administration Officer work with the Principal Deputy Assistant Secretary, Office of Management to implement a monitoring process over the personnel security activities to ensure investigations and reinvestigations are prioritized for personnel with sensitive system access within the Department.	Resolved	11/14/2016	1/26/2017	FSA
We recommend the FSA Chief Financial Officer support the Director, Budget Service in their effort to compile an inventory of the Department's models, and regularly document management's assessment of risks related to each model and how that assessment impact's the Department's level of controls, validation and monitoring over each model.	Resolved	11/14/2016	1/17/2017	FSA

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We recommend the FSA Chief Financial Officer support the Director, Budget Service in their effort to document the Department's process, policies, procedures and related controls for the periodic review, validation and approval of the Department's models at the model and program level.	Resolved	11/14/2016	1/17/2017	FSA
We recommend the FSA CISO strengthen and refine the process for holding FSA system owners and information system security officers accountable for remediation of control deficiencies and ensuring that the appropriate security posture is maintained for FSA information systems.	Resolved	11/14/2016	1/26/2017	FSA
We recommend the FSA Chief Financial Officer support the Director, Budget Service in their effort to document the overall review and conclusions drawn related to the evaluation of the results of model performance reviews and validation procedures performed.	Resolved	11/14/2016	1/17/2017	FSA
We recommend the FSA Chief Financial Officer, the Department Director of Budget Service and the Department Chief Financial Officer document the process, policies, procedures and related controls for managing the operation and use of approved models.	Resolved	11/14/2016	1/17/2017	FSA
We recommend the FSA Chief Financial Officer, the Department Director of Budget Service and the Department Chief Financial Officer design, document and implement a modeling governance structure that specifically and separately addresses the roles and responsibilities for the oversight of critical modeling activities, including model risk assessment, model development, model operation, and model validation activities, as well as defining standards for policies, procedures and internal controls for these activities.	Resolved	11/14/2016	1/17/2017	FSA
We recommend the FSA Chief Financial Officer support the Department Chief Financial Officer to ensure the Department's management controls program fully evaluates the Department's modeling activities commensurate with the materiality of the impact of the process to FSA's reporting activities.	Resolved	11/14/2016	1/17/2017	FSA
The Institute of Education Sciences' Contractor Personnel Security Clearance Process (A19R0002)				
We recommend that the Director of IES ensure that staff involved in the contractor personnel security screening process are aware of and comply with the Directive requirements and fulfill their responsibilities for processing security screenings.	Completed	3/8/2017	4/13/2017	IES
We recommend that the Director of IES develop written policies and procedures to comply with the Directive, to include explanations of the key duties to be performed by specific IES staff, requirements of the contract positions and risk designation process including the use of Position Designation Records, and other internal requirements for the IES contractor personnel security screening process.	Completed	3/8/2017	4/13/2017	IES
We recommend that the Director of IES actively coordinate with OM to learn the adjudication results of current contractor employees assigned to IES contracts to ensure that all contractor employees have been appropriately cleared to work on Department contracts.	Completed	3/8/2017	4/13/2017	IES

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We recommend that the Director of IES reconcile contractor positions with approved position categories and risk level designations and ensure that any changes to positions or risk levels receive appropriate approval.	Completed	3/8/2017	4/13/2017	IES
We recommend that the Director of IES monitor the screening status of contractor employees until final OM adjudication decisions are made.	Completed	3/8/2017	4/13/2017	IES
We recommend that the Director of IES maintain all information and records required by the Directive, to include records of OM adjudication decisions for all contractor employees assigned to IES contracts.	Resolved	3/8/2017	4/13/2017	IES
We recommend that the Director of IES coordinate with CAM to ensure that all required provisions and clauses are included in contract solicitations and final contract documents.	Completed	3/8/2017	4/13/2017	IES
We recommend that the Director of IES ensure that all currently active contractor employees assigned to IES contracts have undergone security screenings at appropriate risk levels as required by Department policy. For those who have not, take immediate action to initiate and complete the security screenings. For contractor employees that do not timely submit the required information, coordinate with the Office of the General Counsel and CAM to determine the appropriate course of action, including removal of these employees from their respective contracts.	Resolved	3/8/2017	4/13/2017	IES
We recommend that the Director of IES ensure that all future contractor employees obtain appropriate security screenings.	Completed	3/8/2017	4/13/2017	IES
We recommend that the Director of IES ensure that contractor security screenings are initiated within 14 days as required by the Directive.	Completed	3/8/2017	4/13/2017	IES
We recommend that the Director of IES ensure IES staff are aware of and have an understanding of their responsibilities and applicable policies and procedures.	Completed	3/8/2017	4/13/2017	IES
Final Independent Auditor's Report Fiscal Years 2016 and 2015 Financial Statements U.S. Department of Education (A17Q0001)				
We recommend that the Secretary of Education work with the Federal Student Aid Chief Operating Officer to continue to execute the corrective actions as outlined in FSA's project plan to comply with the timing requirement for the referral of delinquent non-tax debts.	Resolved	11/14/2016	2/21/2017	OCFO
We recommend the Department CIO ensure the update, review, approval and dissemination of the Information Assurance/ Cybersecurity Policy and associated guidance is completed in order to comply with NIST standards and OMB guidance.	Resolved	11/14/2016	1/26/2017	OCFO
We recommend the Deputy Secretary perform a comprehensive evaluation of the impact of the Department's modeling on the Department's mission in connection with the development of its enterprise risk management program.	Resolved	11/14/2016	1/26/2017	OCFO

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We recommend the Department Chief Financial Officer, in conjunction with the Director, Budget Service document the Department's process, policies and procedures for the design, development, testing and authorization of new models.	Resolved	11/14/2016	1/17/2017	OCFO
We recommend the Department CIO design and implement controls over the handling of Department security and privacy incidents to ensure their resolution is properly documented.	Completed	11/14/2016	1/26/2017	OCFO
We recommend the Department Chief Financial Officer, in conjunction with the Director, Budget Service compile an inventory of the Department's models, and regularly document management's assessment of risks related to each model and how that assessment impact's the Department's level of controls, validation and monitoring over each model.	Resolved	11/14/2016	1/17/2017	OCFO
We recommend the Principal Deputy Assistant Secretary, Office of Management implement a monitoring process over the personnel security activities to ensure investigations and reinvestigations are prioritized for personnel with sensitive system access within the Department.	Resolved	11/14/2016	2/13/2017	OCFO
We recommend the Department Chief Financial Officer, in conjunction with the Director, Budget Service document the Department's process, policies, procedures and related controls for the periodic review, validation and approval of the Department's models at the model and program level.	Resolved	11/14/2016	1/17/2017	OCFO
We recommend the Department CISO work with the FSA CISO to strengthen and refine the process for holding system owners and information system security officers accountable for remediation of control deficiencies and ensuring that the appropriate security posture is maintained for Department and FSA information systems.	Resolved	11/14/2016	2/2/2017	OCFO
We recommend the Department Chief Financial Officer, in conjunction with the Director, Budget Service document the overall review and conclusions drawn related to the evaluation of the results of model performance reviews and validation procedures performed.	Resolved	11/14/2016	1/17/2017	OCFO
We recommend the Director, Budget Service and the Department and FSA Chief Financial Officers document the Department's process, policies, procedures and related controls for managing the operation and use of approved models.	Resolved	11/14/2016	1/17/2017	OCFO
We recommend the Director, Budget Service and the Department and FSA Chief Financial Officers design, document and implement a modeling governance structure that specifically and separately addresses the roles and responsibilities for the oversight of critical modeling activities, including model risk assessment, model development, model operation, and model validation activities, as well as defining standards for policies, procedures and internal controls for these activities.	Resolved	11/14/2016	1/17/2017	OCFO
We recommend the Department Chief Financial Officer ensure the agency's management controls program fully evaluates the Department's modeling activities commensurate with the materiality of the impact of the process to the agency's reporting activities.	Resolved	11/14/2016	1/17/2017	OCFO

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Management Information Report on State Oversight of Local Educational Agency Single Audit Resolution (X09Q0006)				
Develop and issue detailed guidance to all SEAs describing their responsibilities for oversight of the LEA single audit resolution process. The guidance should include information regarding potential weaknesses that may require correction as well as positive practices that SEAs may consider implementing. At a minimum, the guidance should include the following elements. We recommend that the Chief Financial Officer - 1.a Explain the requirement to issue management decisions for all applicable LEA findings within regulatory timeframes and describe the specific content requirements for management decisions from 2 C.F.R § 200.521. Include an illustrative copy of a management decision that meets all content requirements to promote SEA compliance. We recommend that the Chief Financial Officer - 1.b Emphasize the importance of identifying and requiring appropriate corrective actions for LEAs to take to resolve audit findings. Appropriate corrective actions are clear, specific, and can reasonably be expected to correct the underlying cause of the finding. We recommend that the Chief Financial Officer - 1.c Urge SEAs to engage in proactive communication with LEAs throughout the audit resolution process. Inform States of the new requirement in 2 C.F.R. § 200.331(d)(2) to follow up on the status of corrective action and describe the benefits of using cooperative audit resolution techniques. We recommend that the Chief Financial Officer - 1.d Emphasize the importance of enhancing audit resolution activities for significant or repeat findings. This includes escalating the frequency and nature of contact with LEA officials to identify and resolve any barriers to audit resolution. We recommend that the Chief Financial Officer - 1.e Highlight critical controls over single audit resolution that all SEAs should implement, including (1) assigning overall responsibility for oversight of LEA audit resolution to a specific unit within the SEA, (2) developing and implementing detailed policies and procedures that cover all aspects of the SEA's role in LEA audit resolution, (3) establishing an effective process, preferably using database software, for tracking the resolution of LEA audit findings, and (4) implementing a periodic quality assurance process to detect noncompliance and control weaknesses. We recommend that the Chief Financial Officer - 1.f Describe positive practices in oversight of LEA audit resolution that SEAs may implement where feasible, such as (1) issuing enhanced management decisions for repeat findings and encouraging more intensive interaction between SEAs and LEAs to ensure timely and appropriate corrective action, (2) issuing management decisions for financial statement findings and tracking their resolution, (3) establishing an early single audit reporting deadline to expedite the resolution process, and (4) targeting communications related to audit resolution to LEA action officials responsible for implementing corrective action.	Resolved	3/16/2017	5/10/2017	OCFO

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The U.S. Department of Education's Compliance with Improper Payment Reporting Requirements for Fiscal Year 2016 (A04Q0011)				
We recommend that the Chief Financial Officer for the Department, in conjunction with the Chief Financial Officer for FSA submit to Congress and OMB a plan describing actions the Department will take to bring the Pell program into compliance. The plan should also describe actions it will take to ensure that its risk assessments for the Department-managed grant programs and FSA-managed contract activities conform with Section 2(a) of IPIA and with applicable OMB guidance.	Unresolved	5/12/2017		OCFO
We recommend that the Chief Financial Officer for the Department, in conjunction with the Chief Financial Officer for FSA submit to Congress proposed statutory changes necessary to bring the Direct Loan program into compliance.	Unresolved	5/12/2017		OCFO
We recommend that the Chief Financial Officer for the Department, in conjunction with the Chief Financial Officer for FSA identify the VR program in the FY 2017 AFR as a program that may be susceptible to significant improper payments, produce and report a valid improper payment estimate for the program, identify its root causes, and implement corrective actions to reduce improper payments in the program.	Unresolved	5/12/2017		OCFO
We recommend that the Chief Financial Officer for the Department, in conjunction with the Chief Financial Officer for FSA ensure that risk assessments conform with Section 2(a) of IPIA and OMB guidance when determining whether programs may be susceptible to significant improper payments. Specifically, develop improper payment risk assessment models that include all nine required risk factors and other factors, if appropriate, and identify all programs that may be susceptible to significant improper payments.	Unresolved	5/12/2017		OCFO
We recommend that the Chief Financial Officer for the Department, in conjunction with the Chief Financial Officer for FSA as required by OMB guidance, take any additional steps that OMB may recommend to the Department to assist it with becoming compliant with IPERA.	Unresolved	5/12/2017		OCFO
We recommend that the Chief Financial Officer for the Department, in conjunction with the Chief Financial Officer for FSA develop and implement policies and procedures that will ensure FSA includes in the improper payment estimation calculations the results of only those program reviews that can identify Direct Loan or Pell improper payments for the applicable award year.	Unresolved	5/12/2017		OCFO
We recommend that the Chief Financial Officer for the Department, in conjunction with the Chief Financial Officer for FSA revise FSA's quality control process over the Direct Loan and Pell programs improper payment calculations to include controls that will ensure that (1) the disbursement amounts for school branch campuses are correctly included in the improper payment calculations and (2) the correct improper payment amounts are included in the improper payment calculations for program reviews that contain a liability for the estimated loss to the Government instead of the total improper payment amount that the review identified.	Unresolved	5/12/2017		OCFO

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We recommend that the Chief Financial Officer for the Department, in conjunction with the Chief Financial Officer for FSA revise the methodology for estimating improper payments to clarify how it will incorporate improper payments that program reviews identified. Specifically, the methodology should include improper payments identified in a program review report if the improper payments are applicable to the award year for which the Department is calculating the improper payment estimate.	Unresolved	5/12/2017		OCFO
We recommend that the Chief Financial Officer for the Department, in conjunction with the Chief Financial Officer for FSA ensure that the Department's annual reporting on improper payments include the results of the corrective actions it has implemented to address the root causes of improper payments.	Unresolved	5/12/2017		OCFO
We recommend that the Chief Financial Officer for the Department, in conjunction with the Chief Financial Officer for FSA develop and implement policies and procedures that will enable the Department's OCFO to quantify improper payments related to contracts.	Unresolved	5/12/2017		OCFO
The U.S. Department of Education's Federal Information Security Modernization Act of 2014 Report For Fiscal Year 2016 (A11Q0001)				
We recommend that the Deputy Secretary and Under Secretary require OCIO and FSA to ensure that policies and procedures are reviewed and revised at least annually, or as needed. *(Repeat Recommendation from FY 2014 and FY 2015)*	Completed	11/10/2016	1/19/2017	OCIO
We recommend that the Deputy Secretary and Under Secretary require OCIO and FSA to update the outdated configuration management policies and procedures to reflect current NIST and industry standards. *(Repeat Recommendation from FY 2014 and FY 2015)*	Resolved	11/10/2016	1/18/2017	OCIO
We recommend that the Deputy Secretary and Under Secretary require OCIO and FSA to immediately establish TLS 1.1 or higher as the only connection for all Department connections. *(Repeat Recommendation from FY 2015)*	Resolved	11/10/2016	1/19/2017	OCIO
We recommend that the Deputy Secretary and Under Secretary require OCIO and FSA to enable the network access control solution to validate and restrict personal devices from connecting to the Department's internal network. *(Repeat Recommendation starting in FY 2011 through FY 2015)*	Completed	11/10/2016	1/18/2017	OCIO
We recommend that the Deputy Secretary and Under Secretary require OCIO and FSA to immediately correct or mitigate the vulnerabilities identified during the vulnerability assessment.	Completed	11/10/2016	1/18/2017	OCIO
We recommend that the Deputy Secretary and Under Secretary require OCIO and FSA to ensure POA&Ms are created to remedy infrastructure vulnerabilities identified in the Dell and Total System Services, Inc. data center environments.	Completed	11/10/2016	1/19/2017	OCIO
We recommend that the Deputy Secretary and Under Secretary require OCIO and FSA to enforce two-factor authentication on all remote connections. *(Repeat Recommendation from FY 2014 and FY 2015)*	Completed	11/10/2016	1/19/2017	OCIO

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We recommend that the Deputy Secretary and Under Secretary require OCIO and FSA to create POA&Ms to remedy database vulnerabilities identified in the CAMS, EDSTAR, PAS, and COD environments.	Completed	11/10/2016	1/18/2017	OCIO
We recommend that the Deputy Secretary and Under Secretary require OCIO and FSA to resolve access issues to ensure the OIG can complete future vulnerability assessment for the PAS environment.	Resolved	11/10/2016	1/19/2017	OCIO
We recommend that the Deputy Secretary and Under Secretary require OCIO and FSA to enforce two-factor authentication for all users (Federal employees, contractors and external business partners) with unprivileged user network accounts that access internal resources.	Completed	11/10/2016	1/19/2017	OCIO
We recommend that the Deputy Secretary and Under Secretary require OCIO and FSA to develop a reporting mechanism that allows the Department to maintain consistent reporting of unprivileged user accounts and network authentication statuses.	Completed	11/10/2016	1/19/2017	OCIO
We recommend that the Deputy Secretary require OCIO to assess the knowledge, skills, and abilities of individuals with significant security responsibilities.	Resolved	11/10/2016	1/23/2017	OCIO
We recommend the Deputy Secretary require OCIO to develop security training content to close identified gaps identified by the assessments.	Resolved	11/10/2016	1/23/2017	OCIO
We recommend that the Deputy Secretary and the Under Secretary require OCIO and FSA to incorporate additional measures to achieve Level 2 status for their ISCM program. In particular, implement a program that (1) assesses the skills, knowledge, and resources needed to effectively implement an ISCM program at both Levels 1 and 2 and (2) defines ISCM stakeholders and their responsibilities and communicate these across the organization. *(Repeat Recommendation from FY 2015)*	Completed	11/10/2016	1/23/2017	OCIO
We recommend that the Deputy Secretary and Under Secretary require OCIO and FSA to incorporate additional measures to, at a minimum, achieve Level 2 status of the Incident Response program. In particular, (1) assess the skills, knowledge, and resources needed to effectively implement an incident response program and (2) fully implement and enforce incident response capabilities and tools.	Completed	11/10/2016	1/23/2017	OCIO
Management Certifications of Data Reliability (A06O0001)				
We recommend that the Deputy Secretary of Education review how management certifications are used across all programs in the Department, and ensure that certification language provides an assurance of the quality of data, clear accountability, and adequate disclosure of known data limitations.	Completed	2/11/2016	3/29/2016	ODS

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We recommend that the Deputy Secretary of Education review how monitoring protocols are used across all programs in the Department to ensure that they contain steps to assess how well SEA or LEA procedures are working to provide accurate data for key data used in performance reporting or funding decisions.	Completed	2/11/2016	3/29/2016	ODS
We recommend that the Deputy Secretary of Education develop a formal tracking procedure for SEA data issues for use by EDFacts and principal offices that identifies how the data issue was identified, why it occurred, and resolution actions and timeframes.	Completed	2/11/2016	3/29/2016	ODS
We recommend that the Deputy Secretary of Education require all principal offices to follow up on known data errors where the SEA has signed a management certification to determine the causes of the error and ensure that the SEA develops procedures to ensure that it provides accurate information in accordance with the management certification.	Completed	2/11/2016	3/29/2016	ODS
We recommend that the Deputy Secretary of Education revise the Compliance Supplement, as appropriate, to address areas where external auditors should determine whether SEAs have controls in place to ensure that data collected from LEAs and other State agencies are accurate and reliable and support the management certifications they sign.	Resolved	2/11/2016	3/29/2016	ODS
Audit of the Department's Oversight of the Rural Education Achievement Program (A19P0006)				
We recommend that the Assistant Secretary for OESE ensure that SSRP staff develop, finalize, and implement adequate plans to monitor REAP grantees performance toward achieving the program's goals and objectives, and that such monitoring is used to assist grantees with making progress toward the program's goals and objectives.	Completed	9/12/2016	10/12/2016	OESE
We recommend that the Assistant Secretary for OESE ensure that SSRP staff develop, finalize, and implement adequate plans to monitor REAP grantees use of funds to ensure that funds are being used for allowable activities under each of the programs. Consider partnering with other program offices within the Department monitoring the same grantees, when applicable.	Completed	9/12/2016	10/12/2016	OESE
We recommend that the Assistant Secretary for OESE review available A-133 single audit reports for findings pertaining to the REAP or other programs under which REAP funds can be used to assist in the monitoring of REAP grantees.	Completed	9/12/2016	10/12/2016	OESE
We recommend that the Assistant Secretary for OESE implement a risk assessment process to be used in selecting grantees to be monitored. In doing so, consider requesting ERR reports for grantees from RMS, as suggested by OESE's Guidance for OESE Monitoring Plans for grant programs with a large number of grantees.	Completed	9/12/2016	10/12/2016	OESE
We recommend that the Assistant Secretary for OESE consider updating the Compliance Supplement to direct external auditors to review grantees' and subgrantees' uses of REAP funds, particularly where there may be known concerns regarding a grantee's or subgrantee's administration of other Federal grant programs.	Resolved	9/12/2016	10/12/2016	OESE

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We recommend that the Assistant Secretary for OESE ensure that new POs receive adequate training and guidance so they are prepared to adequately manage the responsibilities of being a PO and effectively oversee grantees.	Resolved	9/12/2016	10/12/2016	OESE
We recommend that the Assistant Secretary for OESE review resources currently allocated to SSRP and assess whether SSRP has the resources necessary to adequately perform its oversight responsibilities.	Completed	9/12/2016	10/12/2016	OESE
We recommend that the Assistant Secretary for OESE ensure that all relevant and available sources of information, such as reports from contractor studies and evaluations, are used to inform monitoring efforts or provide assistance to grantees in meeting program goals.	Resolved	9/12/2016	10/12/2016	OESE
We recommend that the Assistant Secretary for OESE ensure that procedures are developed to validate, to the extent possible, data on grantees' performance and use of funds and that collected data is used to inform program monitoring.	Resolved	9/12/2016	10/12/2016	OESE
We recommend that the Assistant Secretary for Communications and Outreach Ensure that the Department continues to effectively coordinate rural education initiatives and efforts, both internally and externally.	Completed	9/12/2016	10/18/2016	OESE
Rehabilitation Services Administration's Internal Controls Over Case Service Report Data Quality (A03N0006)				
We recommend that the Acting Assistant Secretary for the Office of Special Education and Rehabilitative Services require the Commissioner of RSA to develop procedures for periodically reviewing the processes States VR agencies use to capture, review, verify, and submit their RSA-911 report data, including a review of, on at least a sample basis, the supporting documentation for the data.	Completed	12/8/2016	1/19/2017	OSERS
We recommend that the Acting Assistant Secretary for the Office of Special Education and Rehabilitative Services require the Commissioner of RSA to provide guidance to State VR agencies on the importance of developing and implementing adequate internal controls over VR data to ensure that the data State VR agencies report are accurate and complete.	Completed	12/8/2016	1/19/2017	OSERS
We recommend that the Acting Assistant Secretary for the Office of Special Education and Rehabilitative Services require the Commissioner of RSA to provide guidance, training, and technical assistance to State VR agencies on the type of source documentation needed to validate employment and earnings data.	Completed	12/8/2016	1/19/2017	OSERS

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We recommend that the Acting Assistant Secretary for the Office of Special Education and Rehabilitative Services require the Commissioner of RSA to require an authorized State VR official to certify that (1) the State VR agency has internal controls over RSA-911 report data that have been tested and are working as intended, or that the State VR agency has fully disclosed any data limitations and corrective actions; (2) the required RSA-911 report data submitted are accurate and complete; (3) documentation of the procedures performed to ensure the required RSA-911 report data submitted are accurate and complete has been maintained; and (4) they understand submitting inaccurate or incomplete data may result in having to develop and implement corrective actions, or other consequences as determined by the Department.	Completed	12/8/2016	1/19/2017	OSERS
We recommend that the Acting Assistant Secretary for the Office of Special Education and Rehabilitative Services require the Commissioner of RSA to review the results of States' single audit reports for findings related to the RSA-911 report to determine technical assistance needs of State agencies and areas of concern and perform follow-up review activities as necessary.	Completed	12/8/2016	1/19/2017	OSERS
We recommend that the Acting Assistant Secretary for the Office of Special Education and Rehabilitative Services require the Commissioner of RSA to provide guidance to external auditors regarding performing compliance testing of RSA-911 report data.	Completed	12/8/2016	1/19/2017	OSERS
We recommend that the Acting Assistant Secretary for the Office of Special Education and Rehabilitative Services require the Commissioner of RSA to ensure that any updates to its process for performing edit checks of State VR agencies' RSA-911 report data are clearly and adequately documented and disseminated to staff, and that staff are sufficiently trained on the new procedures.	Resolved	12/8/2016	1/19/2017	OSERS
Nationwide Assessment of Charter and Education Management Organizations (A02M0012)				
We recommend that the Delegated Deputy Secretary develop modifications to program monitoring protocols for Title I, IDEA, CSP grants, and other programs to assist Federal grantees in meeting their monitoring and oversight responsibilities with respect to CMOs.	Resolved	9/29/2016	1/10/2017	RMS
We recommend that the Delegated Deputy Secretary convene a formal oversight group including high level representatives from the following offices: Office of the Deputy Secretary, OESE, OSERS, OII, and the Office of the Chief Financial Officer. The oversight group would determine the most appropriate manner to conduct an analysis and assessment of the risks to Department programs posed by charter schools with CMOs. The assessment would consider actions appropriate to the Department's Federal role to assist SEAs, LEAs and charter school authorizers to fulfill their obligations for oversight of Federal funding. Such actions would include, but not be limited to the recommendations that follow.	Resolved	9/29/2016	1/10/2017	RMS

Audit Report Title (Number) Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Delegated Deputy Secretary provide further guidance to SEAs that offers a general strategy for performing a minimum level of monitoring, risk assessment, and mitigation procedures related to charter school contractual relationships with CMOs.	Resolved	9/29/2016	1/10/2017	RMS
We recommend that the Delegated Deputy Secretary work with external partners and interest groups to help SEAs and other authorizers consider risks to Federal funds in their evaluation of proposals for charter schools, including the consideration of what is an acceptable level of risk related to charter school relationships with CMOs.	Resolved	9/29/2016	1/10/2017	RMS
We recommend that the Delegated Deputy Secretary collaborate and coordinate with the Office of the Chief Financial Officer's Post Audit Group to update the OMB Circular A-133 Compliance Supplement to include procedures to determine whether the SEA and LEA, as appropriate, have internal controls to ensure that charter schools with relationships with CMOs have effective controls to mitigate financial risks, provide for accountability over Federal funds, and mitigate performance risks.	Resolved	9/29/2016	1/10/2017	RMS

Acronyms Used in This Report

AFR	Agency Financial Report
CAM	Contracts Acquisition & Management
CFO	Chief Financial Officer
CISO	Chief Information Security Officer
CMO	Charter Management Organization
COD	Common Origination and Disbursement
COR	Contracting Officer's Representative
Department	U.S. Department of Education
EPPM	Enterprise Project Portfolio Management
FSA	Federal Student Aid
IES	Institute of Education Sciences
IPERA	Improper Payments Elimination and Recovery Act
IPIA	Improper Payments Information Act
ISCM	Information Security Continuous Monitoring
IT	Information Technology
LEA	Local Educational Agency
LMM	Lifecycle Management Methodology
NIST	National Institute of Standards and Technology
OCFO	Office of the Chief Financial Officer
OCIO	Office of the Chief Information Officer
ODS	Office of the Deputy Secretary
OESE	Office of Elementary and Secondary Education
OIG	Office of Inspector General
OM	Office of Management
OMB	Office of Management and Budget
OSERS	Office of Special Education and Rehabilitative Services
POA&M	Plan of Action and Milestones
PAG	Post Audit Group
REAP	Rural Education Achievement Program
RMS	Risk Management Services
RSA	Rehabilitation Services Administration
SSRP	School Support and Rural Programs
SEA	State Educational Agency
VR	Vocational Rehabilitation Agency