

Open Recommendations From OIG Internal Audit Reports As of March 31, 2020

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 but the action has not yet been completed, (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. Below are OIG reports with recommendations that were not closed as of March 31, 2020. Links to each report provided. Acronyms defined on page 26 as well as in each report.

Recommendation Status for Nationwide Assessment of Charter and Education Management Organizations ([A02M0012](#))

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
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.	Completed	9/29/2016	1/10/2017	OESE
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	OESE
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.	Completed	9/29/2016	1/10/2017	OESE
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.	Completed	9/29/2016	1/10/2017	OESE
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	Completed	9/29/2016	1/10/2017	OESE

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
controls to mitigate financial risks, provide for accountability over Federal funds, and mitigate performance risks.				

Recommendation Status for Final Independent Auditor’s Report Fiscal Years 2017 and 2016 Financial Statements U.S. Department of Education ([A17R0001](#))

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend the Director, Budget Service develop and document the Department's process, policies and procedures for the authorization, design, development, testing, approval and implementation of new models and model enhancements.	Completed	11/13/2017	1/31/2018	OCFO
We recommend the Director, Budget Service document the Department's process, policies, procedures and related controls for managing the operation and use of approved models.	Completed	11/13/2017	1/31/2018	OCFO
We recommend the Director, Budget Service enhance the process to capture model risks, update the assessment of risks related to each model, and document how that assessment impacts the Department's prioritization of corrective actions, and requisite level of controls, validation and monitoring over each model.	Completed	11/13/2017	2/7/2018	OCFO
We recommend the Director, Budget Service document and enhance the Department's processes, policies, procedures and related controls for the periodic review, validation and approval of the Department's models at the assumption, model and program level.	Completed	11/13/2017	1/31/2018	OCFO
We recommend 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.	Completed	11/13/2017	1/31/2018	OCFO
We recommend the Director, Budget Service ensure modeling risks are considered in connection with the Department's enterprise risk management program.	Completed	11/13/2017	1/23/2018	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.	Completed	11/13/2017	2/7/2018	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.	Completed	11/13/2017	1/23/2018	OCFO

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
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	11/13/2017	1/17/2018	OCFO

Recommendation Status for Final Independent Auditor's Report Fiscal Years 2017 and 2016 Financial Statements Federal Student Aid ([A17R0002](#))

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend the FSA Chief Financial Officer support the efforts of the Director, Budget Service to develop and document the Department's process, policies and procedures for the authorization, design, development, testing, approval and implementation of new models and model enhancements.	Completed	11/13/2017	1/31/2018	FSA
We recommend the FSA Chief Financial Officer support the efforts of the Director, Budget Service to document the Department's process, policies, procedures and related controls for managing the operation and use of approved models.	Completed	11/13/2017	1/31/2018	FSA
We recommend the FSA Chief Financial Officer support the efforts of the Director, Budget Service to enhance the process to capture model risks, update the assessment of risks related to each model, and document how that assessment impacts the Department's prioritization of corrective actions, and requisite level of controls, validation and monitoring over each model.	Completed	11/13/2017	1/31/2018	FSA
We recommend the FSA Chief Financial Officer support the efforts of the Director, Budget Service to document and enhance the Department's processes, policies, procedures and related controls for the periodic review, validation and approval of the Department's models at the assumption, model and program level.	Completed	11/13/2017	1/31/2018	FSA
We recommend the FSA Chief Financial Officer support the efforts of the Director, Budget Service to document the overall review and conclusions drawn related to the evaluation of the results of model performance reviews and validation procedures performed.	Completed	11/13/2017	1/31/2018	FSA
We recommend the FSA Chief Financial Officer support the efforts of the Director, Budget Service to ensure modeling risks are considered in connection with the Department's enterprise risk management program.	Completed	11/13/2017	1/18/2018	FSA
We recommend the FSA Chief Financial Officer ensure modeling risks are considered in connection with FSA's enterprise risk management program.	Completed	11/13/2017	1/19/2018	FSA
We recommend FSA's Chief Administration Officer develop and implement a monitoring process over FSA's personnel security activities to ensure investigations and reinvestigations are prioritized for personnel with sensitive system access within the Department.	Resolved	11/13/2017	2/14/2018	FSA

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend the FSA CISO work with the Department 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.	Completed	11/13/2017	1/18/2018	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	11/13/2017	2/11/2019	FSA

Recommendation Status for Federal Student Aid’s Borrower Defense to Repayment Loan Discharge Process ([I04R0003](#))

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend the Chief Operating Officer for FSA request approval from the Acting Under Secretary to resume the review, approval, and discharge processes for claims qualifying under the seven established categories, including claims that have been flagged for approval	Completed	12/8/2017	1/25/2018	FSA
We recommend the Chief Operating Officer for FSA request approval from the Acting Under Secretary to resume consideration and determination of whether additional categories of claims with common facts qualify for discharge.	Completed	12/8/2017	1/25/2018	FSA
We recommend the Chief Operating Officer for FSA ensure consistent documentation of the review and approval of legal memoranda or other findings used to justify discharges.	Completed	12/8/2017	1/25/2018	FSA
We recommend the Chief Operating Officer for FSA confirm and document OGC advice on the (1) discharge of Everest and WyoTech job placement misrepresentation rate claims and (2) the amount of relief for all job placement rate misrepresentation claims.	Completed	12/8/2017	1/25/2018	FSA
We recommend the Chief Operating Officer for FSA establish and document policies and procedures for reviewing and making determinations on unique or other claims for which FSA has no associated legal memorandum.	Resolved	12/8/2017	1/25/2018	FSA
We recommend the Chief Operating Officer for FSA Document and maintain readily available evidence for all quality control reviews.	Completed	12/8/2017	1/25/2018	FSA
We recommend the Chief Operating Officer for FSA establish and document policies and procedures for discharging loans associated with approved claims with certain characteristics. These characteristics include (a) borrowers enrolled in multiple programs and at least one program is eligible for relief, (b) the borrower received a loan disbursement after the school closed, (c) the	Resolved	12/8/2017	1/25/2018	FSA

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
discharge is impacted by a State's statute of limitations, and (d) the borrower's loan is a Federal Family Education Loan program loan or a Perkins loan.				
We recommend the Chief Operating Officer for FSA establish and document policies and procedures for closing out and issuing decisions on borrower defense claims flagged for denial.	Resolved	12/8/2017	1/25/2018	FSA
We recommend the Chief Operating Officer for FSA establish timeframes for the claims intake, claims review, loan discharge, and claims denial processes and develop controls to ensure timeframes are met.	Resolved	12/8/2017	1/25/2018	FSA
We recommend the Chief Operating Officer for FSA implement an information system that (a) maintains quality information regarding borrower defense claims, process status, and decision outcomes; (b) allows for claim data queries for all stages of claim review; and (c) contains controls to protect the integrity of the claims data.	Resolved	12/8/2017	2/20/2018	FSA

Recommendation Status for Federal Student Aid's Contractor Personnel Security Clearance Process ([A19R0003](#))

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Chief Operating Officer for FSA ensure that staff involved in the contractor personnel security screening process are aware of and comply with the Directive requirements, to include any subsequent updates to the requirements, and fulfill their responsibilities for processing security screenings.	Completed	4/17/2018	6/6/2018	FSA
We recommend that the Chief Operating Officer for FSA develop written policies and procedures to comply with the Directive, to include explanations of the key duties to be performed by specific FSA staff, requirements of the contract positions and risk designation process including the use of Position Designation Records, and other internal requirements for the FSA contractor personnel security screening process, as well as contractor employee departure procedures.	Completed	4/17/2018	6/6/2018	FSA
We recommend that the Chief Operating Officer for FSA have appropriate FSA staff develop and approve complete position category listings and associated risk level designations for all contractor positions on each contract, through FSA justification of position responsibilities and access, and through reconciliation of current contract position risk levels and any available position risk level designation records.	Completed	4/17/2018	6/6/2018	FSA
We recommend that the Chief Operating Officer for FSA ensure that screenings are initiated at the appropriate risk level based on the contractor employee's position risk level that was classified and approved by FSA.	Completed	4/17/2018	6/6/2018	FSA

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Chief Operating Officer for FSA coordinate with OM to learn the adjudication results of current contractor employees assigned to FSA contracts to ensure that all contractor employees either have a screening initiated or have been appropriately cleared to work on Department contracts.	Completed	4/17/2018	6/6/2018	FSA
We recommend that the Chief Operating Officer for FSA monitor the screening status of contractor employees until final OM adjudication decisions are made.	Completed	4/17/2018	6/6/2018	FSA
We recommend that the Chief Operating Officer for FSA maintain all information and records required by the Directive, to include up-to-date listings of all contractor employees assigned to FSA contracts and records of OM adjudication decisions for all contractor employees assigned to FSA contracts.	Completed	4/17/2018	6/6/2018	FSA
We recommend that the Chief Operating Officer for FSA ensure that all contractor employee departures are reported to OM as required, and inform contractor companies on a regular basis of their responsibility to notify FSA of contractor employee departures. Also ensure that contractors provide PIV cards to the COR upon contractor employee departure, as required.	Resolved	4/17/2018	7/31/2018	FSA
We recommend that the Chief Operating Officer for FSA identify and begin tracking all active contractor employees assigned to FSA contracts, along with their risk level and any IT access, to ensure that all contractor employees have undergone security screenings at appropriate risk levels as required by Department policy. For those who have not, take immediate action to complete the security screenings and/or deny further access to Department facilities, systems, and information until appropriate security screenings are completed or required screening information is submitted. Alert the Department CISO of the condition.	Completed	4/17/2018	6/19/2018	FSA
We recommend that the Chief Operating Officer for FSA determine through system security audit logs and other appropriate validation processes, if there were instances of unauthorized access to Department information and systems and report appropriately, at a minimum to the Department's CISO.	Completed	4/17/2018	6/6/2018	FSA
We recommend that the Chief Operating Officer for FSA ensure that security screenings and reinvestigations are initiated within the timeframes established by the Directive.	Completed	4/17/2018	6/4/2018	FSA
We recommend that the Chief Operating Officer for FSA ensure that all contractor employees complete the appropriate screening steps before receiving access to IT systems or Department sensitive or Privacy Act-protected information.	Completed	4/17/2018	6/6/2018	FSA
We recommend that the Chief Operating Officer for FSA ensure that contractor employees review and sign applicable Rules of Behavior for IT systems they are accessing.	Completed	4/17/2018	6/6/2018	FSA
We recommend that the Chief Operating Officer for FSA ensure that ISSOs maintain and exercise access approval rights over any IT systems that contain or can access sensitive Department data, whether owned by the Department or by the contractor, and modify applicable contracts accordingly to reflect the FSA ISSO approval rights.	Completed	4/17/2018	6/4/2018	FSA

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Chief Operating Officer for FSA ensure that any contractor employees with discontinued or rejected investigations have all access to sensitive Department information, including any IT access, discontinued until appropriate screening steps have been completed. Alert the Department CISO should this condition exist.	Completed	4/17/2018	7/9/2018	FSA
We recommend that the Chief Operating Officer for FSA ensure that all non-U.S. citizens, current and prospective, are permitted to work on Department contracts only after appropriate steps have been taken with regard to waiver documentation, as required by the Directive.	Completed	4/17/2018	7/9/2018	FSA
We recommend that the Chief Operating Officer for FSA ensure that FSA staff are aware of and have an understanding of their responsibilities and applicable policies and procedures.	Completed	4/17/2018	6/5/2018	FSA

Recommendation Status for U.S. Department of Education’s Recognition and Oversight of Accrediting Agencies ([A09R0003](#))

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Assistant Secretary for OPE require the OPE Accreditation Group to use risk-based procedures and readily available information to identify the specific schools and an appropriate number of schools that each agency must use as evidence to demonstrate that it had effective mechanisms for evaluating a school's compliance with accreditation standards before reaching an accreditation decision.	Resolved	6/27/2018	8/22/2018	OPE
We recommend that the Assistant Secretary for OPE require the OPE Accreditation Group to adopt written policies and procedures for evaluating agency recognition petitions that incorporate the elements of Recommendation 1.1 and address specific documentation requirements to include each selected school's complete self-study report and the agency's site visit report and decision letter.	Resolved	6/27/2018	8/22/2018	OPE
We recommend that the Assistant Secretary for OPE require the OPE Accreditation Group to adopt a risk-based methodology, using readily available information, to identify high-risk agencies and prioritize its oversight of those agencies during the recognition period.	Resolved	6/27/2018	8/22/2018	OPE

Recommendation Status for The Department’s Implementation of the Contractor Personnel Security Clearance Process ([A19P0008](#))

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Assistant Secretary for Management develop and distribute written policies and procedures that include (1) new Federal and Department requirements for the contractor personnel security screening process established since the issuance of the Directive in 2010, and (2) existing Department practices for the screening process that have been informally approved by OM but are not addressed in current written policies and procedures.	Completed	9/20/2018	11/6/2018	OM
We recommend that the Assistant Secretary for Management periodically review the security screening process and assess the need to update policy accordingly. Develop and distribute interim guidance as necessary.	Completed	9/20/2018	11/1/2018	OM
We recommend that the Assistant Secretary for Management require POs to develop internal procedures for the contractor personnel security screening process, review the PO-developed procedures for compliance with the Directive, review any modifications to PO procedures, and maintain the procedural documents provided by POs.	Resolved	9/20/2018	11/1/2018	OM
We recommend that the Assistant Secretary for Management develop a process to ensure POs receive and maintain notification of all final adjudication determinations, both favorable and unfavorable, for each individual contractor employee who has received a security screening.	Resolved	9/20/2018	11/1/2018	OM
We recommend that the Assistant Secretary for Management establish an appropriate role for OM in the contract position and risk designation process, in coordination with PO and OCFO staff, and ensure requirements for position risk designation tools and documentation requirements are adequately communicated.	Completed	9/20/2018	11/1/2018	OM
We recommend that the Assistant Secretary for Management ensure that all elements of the security screening process, including initiation, adjudications, and reinvestigations are conducted within required timeframes. Align Directive requirements with applicable OPM metrics.	Resolved	9/20/2018	11/1/2018	OM
We recommend that the Assistant Secretary for Management review the staff structure and resources of Personnel Security and make changes, as appropriate, to ensure timely processing of security screenings and that proper oversight and guidance of the Department's contractor personnel security screening process is provided.	Completed	9/20/2018	11/1/2018	OM
We recommend that the Assistant Secretary for Management coordinate with POs to reconcile current Security Manager data with PO records on individual contractor employees for information such as contractor employee name, contractor company, assigned contract number, employment status, and departure date as applicable. Periodically reconcile Security Manager data with PO records.	Completed	9/20/2018	11/1/2018	OM
We recommend that the Assistant Secretary for Management require information necessary for tracking the status of contractor employees' security screenings and employment on Department	Completed	9/20/2018	11/1/2018	OM

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
contracts to be entered into Security Manager, to include contractor company and contract number.				
We recommend that the Assistant Secretary for Management review the current access of PO staff to Security Manager to determine if granting further access to key staff could help ensure the reliability of Security Manager data, and then grant access accordingly.	Completed	9/20/2018	11/1/2018	OM
We recommend that the Assistant Secretary for Management develop comprehensive training for the contractor personnel security screening process that covers process requirements and the responsibilities of key PO officials and staff, to include use of Security Manager and the Position Designation Tool. Require all applicable staff to attend.	Resolved	9/20/2018	11/1/2018	OM

Recommendation Status for The Department’s Oversight of the Indian Education Formula Grant Program ([A19Q0002](#))

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Assistant Secretary for OESE ensure that OIE management and the OIE Formula Team develop, finalize, and implement detailed written policies and procedures on monitoring grantees' performance toward achieving the program's goals and objectives, to include ensuring grantees submit all requested documentation, documenting conclusions with regard to adequacy of grantee performance in areas reviewed as well as overall conclusions on whether grantees are meeting program objectives, requesting and timely following up on corrective actions when needed, and that such monitoring is used to assist grantees in making progress in meeting those goals and objectives.	Completed	9/28/2018	11/1/2018	OESE
We recommend that the Assistant Secretary for OESE ensure that OIE management and the OIE Formula Team develop, finalize, and implement detailed written policies and procedures for monitoring grantees' use of funds, to include ensuring documentation related to expenditures is submitted and reviewed to verify that funds are being used for allowable activities and that resulting conclusions are documented and applicable corrective actions are requested and timely followed up on.	Completed	9/28/2018	11/1/2018	OESE
We recommend that the Assistant Secretary for OESE ensure that OIE management and the OIE Formula Team develop, finalize, and implement detailed written policies and procedures regarding the student count verification process to ensure that student counts are being appropriately verified and documented, and any issues are proactively identified.	Completed	9/28/2018	11/1/2018	OESE

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Assistant Secretary for OESE ensure that OIE management and the OIE Formula Team develop, finalize, and implement detailed written policies and procedures for developing monitoring plans that consider multiple risk factors. In doing so, consider requesting Entity Risk Review 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	9/28/2018	11/1/2018	OESE
We recommend that the Assistant Secretary for OESE encourage OIE management to conduct research on best practices employed by similarly situated programs, such as other formula grant programs at the Department with large numbers of grantees, and consider adapting and/or adopting practices that may be used to better oversee and monitor Indian Education Formula Grant program grantees.	Completed	9/28/2018	11/1/2018	OESE
We recommend that the Assistant Secretary for OESE ensure that OIE management and the OIE Formula Team receive necessary training and guidance so they are prepared to adequately manage the responsibilities of effectively overseeing grantees.	Completed	9/28/2018	11/1/2018	OESE
We recommend that the Assistant Secretary for OESE ensure that OIE management and the OIE Formula Team are aware of and comply with existing standards for grant file documentation that align with Department policies.	Completed	9/28/2018	11/1/2018	OESE
We recommend that the Assistant Secretary for OESE require the OIE Formula Team to identify desktop monitoring reports with open or unresolved items and conduct necessary follow-up with grantees to close out the monitoring reports.	Completed	9/28/2018	11/1/2018	OESE
We recommend that the Assistant Secretary for OESE ensure that OIE management develops, finalizes, and implements detailed written policies and procedures for reviewing APRs, to include ensuring all APRs are received and uploaded to the grant files, reviewing progress toward achieving project objectives, following up with grantees when necessary, and appropriately documenting related communications.	Completed	9/28/2018	11/1/2018	OESE
We recommend that the Assistant Secretary for OESE ensure that APR and GPRA data are analyzed to identify areas for improvement and that such analysis is used so that appropriate actions can be taken to help improve program performance.	Completed	9/28/2018	11/1/2018	OESE
We recommend that the Assistant Secretary for OESE ensure OIE management adequately communicates to program staff expectations related to monitoring, to include defined roles and responsibilities, to help ensure the effective and uniform monitoring of Indian Education Formula Grant program grantees.	Completed	9/28/2018	11/1/2018	OESE
We recommend that the Assistant Secretary for OESE review the management and staff structure and resources of OIE and make changes, as appropriate, to ensure that proper oversight and monitoring of Indian Education Formula Grant program grantees is conducted.	Completed	9/28/2018	11/1/2018	OESE

Recommendation Status for Nationwide Audit of Oversight of Closed Charter Schools ([A02M0011](#))

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Deputy Secretary coordinate with the Assistant Secretary for OESE, the Assistant Secretary of OSERS and Acting Assistant Deputy Secretary for OII to develop a risk assessment that identifies SEAs that fund charter schools and considers the risks to Federal funds associated with charter school closures and monitor SEAs based on this assessment, focusing on those elements of the charter school closure process that pose the most risk.	Completed	9/28/2018	11/30/2018	OII
We recommend that the Deputy Secretary coordinate with the Assistant Secretary for OESE, the Assistant Secretary of OSERS and Acting Assistant Deputy Secretary for OII to review guidance issued by the Department to determine whether it adequately addresses issues related to Federal grant closeout, disposition of assets purchased with Federal funds, and protection and maintenance of student records for closed charter schools, and either modify the current guidance or issue new guidance as appropriate.	Completed	9/28/2018	11/30/2018	OII
We recommend that the Deputy Secretary coordinate with the Assistant Secretary for OESE, the Assistant Secretary of OSERS and Acting Assistant Deputy Secretary for OII to work with SEAs to develop and implement effective charter school closure procedures. In doing so, identify and share best practices and relevant requirements for SEAs regarding Federal grant closeout, disposition of assets purchased with Federal funds, and protection and maintenance of student records to ensure that charter schools that are identified for closure by the responsible State and local entities are closed in an appropriate manner.	Completed	9/28/2018	11/30/2018	OII

Recommendation Status for The U.S. Department of Education’s Federal Information Security Modernization Act of 2014 Report for Fiscal Year 2018 ([A11S0001](#))

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Deputy Secretary and Chief Operating Officer require that OCIO and FSA incorporate additional measures to, at a minimum; achieve Level 4 Managed and Measurable status of the Risk Management program. (Repeat Recommendation from FY 2017)	Resolved	10/31/2018	1/10/2019	OCIO
We recommend that the Deputy Secretary and Chief Operating Officer require that OCIO and FSA ensure the completeness of individual corrective action plans for elements including remediation officials assigned, costs associated to remediate the weakness, and starting dates to remediate the weakness.	Completed	10/31/2018	1/10/2019	OCIO

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Deputy Secretary and the Chief Operating Officer require that OCIO and FSA ensure that all contracts are reviewed and include all applicable privacy, security, and access provisions. (Repeat Recommendation from FY 2017)	Completed	10/31/2018	1/14/2019	OCIO
We recommend that the Deputy Secretary and Chief Operating Officer require that OCIO and FSA incorporate additional measures to, at a minimum; achieve Level 3 Consistently Implemented status of the Configuration Management program. (Repeat Recommendation from FY 2017)	Resolved	10/31/2018	1/10/2019	OCIO
We recommend the Deputy Secretary and Chief Operating Officer require that OCIO and FSA migrate to Transport Layer Security 1.2 or higher as the only connection for all Department connections. (Repeat Recommendation from FY 2015, 2016, and 2017)	Resolved	10/31/2018	1/10/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure that the configuration of 40 websites to be routed through a trusted internet connection or managed trusted internet protocol service.	Resolved	10/31/2018	1/11/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure that all existing websites and services are accessible through a secure connection as required by OMB M-15-13. (Repeat Recommendation from FY 2017)	Resolved	10/31/2018	1/11/2019	OCIO
We recommend that the Chief Operating Officer require FSA to discontinue the use of unsupported operating systems, databases, and applications. (Repeat Recommendation from FY 2015 and 2017)	Completed	10/31/2018	1/11/2019	OCIO
We recommend that the Chief Operating Officer require FSA to eliminate the use of Social Security numbers as an authentication element when logging onto FSA websites by requiring the user to create a unique identifier for account authentication. (Repeat Recommendation from FY 2014 and 2017)	Completed	10/31/2018	1/11/2019	OCIO
We recommend that the Chief Operating Officer require FSA to ensure that all websites and portals hosting personally identifiable information are configured not to display clear text. (Repeat Recommendation from FY 2014 and 2017)	Completed	10/31/2018	1/14/2019	OCIO
We recommend that the Chief Operating Officer require FSA to immediately correct or mitigate the vulnerabilities during the vulnerability assessment. (Repeat Recommendation from FY 2015 and 2017)	Completed	10/31/2018	1/11/2019	OCIO
We recommend that the Deputy Secretary and Chief Operating Officer require OCIO and FSA to incorporate additional measures to, at a minimum; achieve Level 3 Consistently Implemented status of the Identity and Access Management program. (Repeat Recommendation from FY 2017)	Resolved	10/31/2018	1/11/2019	OCIO
We recommend that the Deputy Secretary and Chief Operating Officer require OCIO and FSA to ensure that position risk designations are documented for background investigations.	Completed	10/31/2018	1/11/2019	OCIO
We recommend that the Deputy Secretary and Chief Operating Officer require OCIO and FSA to enforce a two-factor authentication configuration for all user connections to systems and applications. (Repeat Recommendation from FY 2011, 2012, 2013, 2014, 2015, 2016 and 2017)	Resolved	10/31/2018	1/15/2019	OCIO
We recommend that the Deputy Secretary require OCIO to finalize Departmental Directive OM: 5-101, "Personnel Security Screening Requirements for Contractor Employees."	Resolved	10/31/2018	1/11/2019	OCIO

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Deputy Secretary require OCIO to fully implement the Department's ICAM strategy to ensure that the Department meets full Federal Government implementation of ICAM. (Repeat Recommendation from FY 2017)	Resolved	10/31/2018	1/11/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure the Network Access Control solution is configured to disallow users to reconnect devices after being blocked.	Completed	10/31/2018	1/11/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure access agreements--in particular non-disclosure agreements for privileged users with access to sensitive information, and Rules of Behavior acknowledgements--are documented for users accessing Department and FSA systems.	Completed	10/31/2018	1/11/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure that terminated individual's network access is removed timely.	Completed	10/31/2018	1/11/2019	OCIO
We recommend that the Chief Operating Officer require FSA to establish a process for identifying, managing, and tracking activity of privileged user accounts. (Repeat Recommendation from FY 2017)	Completed	10/31/2018	1/11/2019	OCIO
We recommend that the Chief Operating Officer require FSA to configure all websites to display warning banners when users login to Departmental resources and ensure that banners include approved warning language. (Repeat Recommendation from FY 2017)	Completed	10/31/2018	1/11/2019	OCIO
We recommend that the Chief Operating Officer require FSA to create corrective action plans to remedy database vulnerabilities for all database vulnerabilities identified. (Repeat Recommendation from FY 2017)	Completed	10/31/2018	1/11/2019	OCIO
We recommend that the Chief Operating Officer require FSA to validate the inactivity settings to ensure sessions are timing out after 30 minutes of inactivity. (Repeat Recommendation from FY 2011, 2012, and 2015)	Completed	10/31/2018	1/11/2019	OCIO
We recommend that the Deputy Secretary and the Chief Operating Officer require OCIO and FSA to incorporate additional measures to, at a minimum, achieve Level 3 Consistently Implemented status of the Data Protection and Privacy program.	Resolved	10/31/2018	1/11/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure that the Handbook for Protection of Sensitive But Unclassified Information is updated.	Completed	10/31/2018	1/11/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure the Department's Breach Response Plan is tested annually.	Completed	10/31/2018	1/11/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure that Privacy Impact Assessments are reviewed every two years.	Completed	10/31/2018	1/11/2019	OCIO
We recommend that the Deputy Secretary require OCIO to incorporate additional measures to, at a minimum, achieve Level 3 Consistently Implemented status of the Security Training program. (Repeat Recommendation from FY 2017)	Resolved	10/31/2018	1/11/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure that contractor employees fulfill mandatory training requirements before accessing Department systems. (Repeat Recommendation from FY 2017)	Completed	10/31/2018	1/11/2019	OCIO

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Deputy Secretary require OCIO to define and implement a process to track contractors' initial access to the Department's network.	Completed	10/31/2018	1/14/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure that user accounts are suspended timely when users do not complete required training.	Completed	10/31/2018	1/14/2019	OCIO
We recommend that the Deputy Secretary require OCIO to implement the process for identifying employees with significant security responsibilities and ensure role-based training is provided.	Resolved	10/31/2018	1/14/2019	OCIO
We recommend that the Deputy Secretary require OCIO to implement the process for formal skill assessments of employees' educational level and experience to begin full reporting to the Office of Personnel Management by April 2019.	Completed	10/31/2018	1/14/2019	OCIO
We recommend that the Deputy Secretary and the Chief Operating Officer require OCIO and FSA to incorporate additional measures to, at a minimum; achieve Level 3 Consistently Implemented status of the ISCM program. (Repeat Recommendation from FY 2017)	Resolved	10/31/2018	1/14/2019	OCIO
We recommend that the Deputy Secretary require OCIO to automate its capabilities for monitoring the security controls effectiveness and overall implementation of the ISCM Roadmap. (Repeat Recommendation from FY 2017)	Resolved	10/31/2018	1/14/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure that ISCM stakeholders with designated roles and responsibilities are properly educated and engaged. (Repeat Recommendation from FY 2017)	Resolved	10/31/2018	1/14/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure all information authorizing officials, information system owners, and information system security officers establish and use accounts within the Cyber Security Assessment and Management tool, and that required points of contacts are identified. (Repeat Recommendation from FY 2017)	Completed	10/31/2018	1/14/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure the completion of Phases 1 and 2 of the Continuous Diagnostics and Mitigation program. (Repeat Recommendation from FY 2017)	Resolved	10/31/2018	1/14/2019	OCIO
We recommend that the Deputy Secretary require OCIO to incorporate additional measures to, at a minimum; achieve Level 3 Consistently Implemented status of the Incident Response program. (Repeat Recommendation from FY 2017)	Resolved	10/31/2018	1/14/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure that incidents are consistently submitted to US-CERT and the OIG within the required timeframe and all incidents are consistently categorized. (Repeat Recommendation from FY 2017)	Resolved	10/31/2018	1/14/2019	OCIO
We recommend that the Deputy Secretary require OCIO to enable incident response tools and technologies to function on an enterprise basis.	Resolved	10/31/2018	1/14/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure that data loss prevention technologies work as intended for the blocking of sensitive information transmission.	Resolved	10/31/2018	1/15/2019	OCIO
We recommend that the Deputy Secretary and Chief Operating Officer require OCIO and FSA to incorporate additional measures to, at a minimum; achieve Level 4 Managed and Measurable status of the Contingency Planning program. (Repeat Recommendation from 2017)	Resolved	10/31/2018	1/14/2019	OCIO

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Deputy Secretary and Chief Operating Officer require OCIO and FSA to ensure that contingency planning documentation and results of contingency plan testing are documented consistently and timely. (Repeat Recommendation from FY 2012, 2014, and 2015)	Completed	10/31/2018	1/14/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure that skills are being measured at the enterprise level to begin full reporting to the Office of Personnel Management by April 2019. (Repeat Recommendation from 2017)	Completed	10/31/2018	1/14/2019	OCIO

Recommendation Status for Office of the Chief Privacy Officer's Processing of Family Educational Rights and Privacy Act Complaints ([A09R0008](#))

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Acting Assistant Secretary of the Office of Management require the Privacy Office to allocate appropriate resources to the Compliance Office based on the stated priority of reducing or eliminating the investigation backlog so that FERPA complaints are resolved in a timely manner.	Completed	11/26/2018	1/8/2019	OPEPD
We recommend that the Acting Assistant Secretary of the Office of Management require the Privacy Office to work with the Office of General Counsel to resolve outstanding policy issues that impede the Compliance Office's ability to investigate certain FERPA complaints.	Resolved	11/26/2018	1/8/2019	OPEPD
We recommend that the Acting Assistant Secretary of the Office of Management require the Privacy Office to implement an effective FERPA complaint tracking system that allows the Compliance Office to account for and track all complaints it receives, including the status and outcome of each complaint, and that provides an effective mechanism for reliable performance measurement and reporting.	Completed	11/26/2018	1/8/2019	OPEPD
We recommend that the Acting Assistant Secretary of the Office of Management require the Privacy Office to use reliable performance data to design and implement appropriate performance standards for the Compliance Office as a whole and for individual personnel responsible for handling complaints.	Completed	11/26/2018	1/8/2019	OPEPD
We recommend that the Acting Assistant Secretary of the Office of Management require the Privacy Office to investigate all complaints that meet the criteria requiring investigation and do not place complaints into an "inactive" status.	Completed	11/26/2018	1/8/2019	OPEPD
We recommend that the Acting Assistant Secretary of the Office of Management require the Privacy Office to revise processes for resolving FERPA complaints to ensure effective and appropriate communication with the complainant, to include providing dismissal notifications,	Completed	11/26/2018	1/8/2019	OPEPD

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
updates, and responses to inquiries in a timely manner and recording all communication in the tracking system.				
We recommend that the Acting Assistant Secretary of the Office of Management require the Privacy Office to design and implement a risk-based approach to processing and resolving FERPA complaints, where complaints deemed highest risk are prioritized. Risk can be evaluated based on the subject matter of the complaint, the severity of risk to student privacy, the number of students affected, or other relevant factors.	Completed	11/26/2018	1/8/2019	OPEPD
We recommend that the Acting Assistant Secretary of the Office of Management require the Privacy Office to review and evaluate its current policies and procedures for processing FERPA complaints to ensure they are complete and appropriate.	Completed	11/26/2018	1/8/2019	OPEPD

Recommendation Status for The U.S. Department of Education’s Compliance with Improper Payment Reporting Requirements for Fiscal Year 2018

[\(A04T0004\)](#)

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
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 to ensure that the Accounts Receivable and Bank Management Group establishes accounts receivable for schools’ liabilities from program reviews and audits.	Resolved	5/29/2019	7/15/2019	OCFO
We recommend that the Chief Financial Officer for the Department, in conjunction with the Chief Financial Officer for FSA revise the query the Department uses to gather accounts receivable data from its accounting system so that it captures all program review and audit liabilities that should be used in its improper payment reporting, and ensure that the report generated as a result of the query is validated for accuracy.	Completed	5/29/2019	7/15/2019	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 to require the Accounts Receivable and Bank Management Group to reconcile all program review and audit liabilities to the accounts receivable in the Department’s accounting system for FY 2018, and for future years ensure that the reconciliation is completed before the AFR is published.	Completed	5/29/2019	7/15/2019	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 to require FSA’s School	Resolved	5/29/2019	7/15/2019	OCFO

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
Participation Division to confirm that the Accounts Receivable and Bank Management Group received the notices it sent to establish accounts receivable for program review and audit liabilities.				
We recommend that the Chief Financial Officer for the Department, in conjunction with the Chief Financial Officer for FSA ensure that all identified and recaptured improper payments from grant refunds that have been confirmed to be improper payments are included in the AFR's Payment Integrity reporting.	Completed	5/29/2019	7/17/2019	OCFO
We recommend that the Chief Financial Officer for the Department, in conjunction with the Chief Financial Officer for FSA develop and implement controls to ensure that all improper payment root cause data and associated amounts are reported in the improper payment root cause section of the AFR, as required.	Completed	5/29/2019	7/15/2019	OCFO

Recommendation Status for The Department's Compliance with FITARA Requirements ([A19S0002](#))

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the CIO fully implement the CIO authority enhancements as defined in the FITARA Common Baseline.	Resolved	9/23/2019	12/9/2019	OCIO
We recommend that the CIO update, finalize, and implement policies and procedures related to all CIO authority enhancements found in the FITARA Common Baseline, and ensure that those policies and procedures are followed.	Completed	9/23/2019	12/9/2019	OCIO
We recommend that the CIO ensure sufficient oversight of the implementation of the FITARA Common Baseline and related policies and procedures, to include maintaining documentation that supports completion of tasks related to FITARA requirements and ensuring tasks adequately address FITARA requirements.	Resolved	9/23/2019	12/9/2019	OCIO
We recommend that the CIO update established processes to ensure that there are documented outputs of the process that the CIO, or the person to whom the CIO delegates authority, reviews and approves all acquisition plans, acquisition strategies, interagency agreements, and contract actions that contain IT without an approved acquisition strategy or acquisition plan, and that all acquisition strategies and plans that include IT apply adequate incremental development principles.	Resolved	9/23/2019	12/9/2019	OCIO
We recommend that the CIO update, finalize, and implement policy on classifying major IT investments to ensure that investments that are exempted from policy are clearly documented and the treatment of full-time equivalent costs is consistently applied.	Completed	9/23/2019	12/9/2019	OCIO

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the CIO complete CIO risk ratings for all major IT investments regularly, as required by Capital Planning and Investment Control guidance, to ensure that risk ratings reflect the CIO's assessment of the current level of risk for the major investment's ability to accomplish its goals.	Completed	9/23/2019	12/9/2019	OCIO
We recommend that the CIO calculate all CIO risk ratings of major IT investments in accordance with Department policy to ensure the correct level of risk is assigned.	Completed	9/23/2019	12/9/2019	OCIO
We recommend that the CIO update, finalize, and implement policy to meet FITARA TechStat requirements, including requirements for TechStat sessions to be held for any investments rated as high risk for three consecutive months and specifying timeframes in which required TechStat sessions should be held, and ensuring documentation is maintained in accordance with Department policy.	Completed	9/23/2019	12/9/2019	OCIO
We recommend that the CIO maintain applicable supporting documentation of TechStat sessions as noted in current Department TechStat guidance.	Completed	9/23/2019	12/9/2019	OCIO
We recommend that the CIO maintain PortfolioStat meeting documentation in accordance with Government Accountability Office Standards for Internal Control, Federal records management regulations, and Department policy for correspondence with OMB and other information regarding milestones as they relate to FITARA reporting requirements.	Completed	9/23/2019	12/9/2019	OCIO
We recommend that the CIO ensure appropriate oversight of the PortfolioStat process, to include quarterly reporting of action item status, annual review and certification of action items, and timely completion of action items.	Resolved	9/23/2019	12/30/2019	OCIO
We recommend that the CIO hold briefings with the Federal CIO and agency head regarding any PortfolioStat action items with missed deadlines as required by OMB M-15-14.	Resolved	9/23/2019	12/30/2019	OCIO

Recommendation Status for The U.S. Department of Education's Federal Information Security Modernization Act of 2014 Report for Fiscal Year 2019

[\(A11T0002\)](#)

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Deputy Secretary and Chief Operating Officer require that OCIO and FSA incorporate additional measures to, at a minimum, achieve Level 3 Consistently Implemented status of the Risk Management program.	Resolved	10/31/2019	12/30/2019	OCIO
We recommend that the Deputy Secretary and Chief Operating Officer require that OCIO and FSA ensure that POA&M remediation is performed within the required timeframe.	Resolved	10/31/2019	1/8/2020	OCIO

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Deputy Secretary and Chief Operating Officer require that OCIO and FSA ensure that all POA&Ms are assigned with the required appropriate remediation official.	Completed	10/31/2019	12/30/2019	OCIO
We recommend that the Deputy Secretary and Chief Operating Officer require that OCIO and FSA incorporate additional measures to, at a minimum, achieve Level 3 Consistently Implemented status of the Configuration Management program.	Resolved	10/31/2019	12/30/2019	OCIO
We recommend that the Deputy Secretary and Chief Operating Officer require that OCIO and FSA migrate to Transport Layer Security 1.2 or higher as the only connection for all Department connections.	Resolved	10/31/2019	12/30/2019	OCIO
We recommend that the Deputy Secretary and Chief Operating Officer require that OCIO and FSA review solutions to ensure that the default username and password has been changed.	Completed	10/31/2019	1/8/2020	OCIO
We recommend that the Deputy Secretary require OCIO to ensure that 51 websites are routed through a trusted internet connection or managed trusted internet protocol service.	Resolved	10/31/2019	12/30/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure that all existing websites and services are accessible through a secure connection as required by OMB M-15-13	Resolved	10/31/2019	12/30/2019	OCIO
We recommend that the Chief Operating Officer require FSA to discontinue the use of unsupported operating systems, databases, and applications.	Resolved	10/31/2019	1/8/2020	OCIO
We recommend that the Chief Operating Officer require FSA to ensure that all websites and portals hosting personally identifiable information are configured not to display clear text.	Resolved	10/31/2019	1/8/2020	OCIO
We recommend that the Chief Operating Officer require FSA eliminate the use of Social Security numbers as an authentication element when logging into FSA websites by requiring the user to create a unique identifier for account authentication. (Repeat Recommendation FY 2018 & FY 2019).	Resolved	10/31/2019	1/8/2020	OCIO
We recommend that the Chief Operating Officer require FSA to immediately correct or mitigate the vulnerabilities identified during the security assessment	Completed	10/31/2019	12/30/2019	OCIO
We recommend that the Deputy Secretary and Chief Operating Officer require OCIO and FSA to incorporate additional measures to, at a minimum, achieve Level 3 Consistently Implemented status of the Identity and Access Management program.	Resolved	10/31/2019	12/30/2019	OCIO
We recommend that the Deputy Secretary and Chief Operating Officer require OCIO and FSA to ensure that terminated users' network access is removed timely.	Resolved	10/31/2019	12/30/2019	OCIO
We recommend that the Deputy Secretary and Chief Operating Officer require OCIO and FSA to ensure that access agreements for users accessing Department and FSA systems are documented and maintained. (Repeat Recommendation FY 2018 & FY 2019)	Resolved	10/31/2019	1/8/2020	OCIO
We recommend that the Deputy Secretary and Chief Operating Officer require OCIO and FSA to consistently document position risk designations for background investigations.	Resolved	10/31/2019	1/8/2020	OCIO
We recommend that the Deputy Secretary require OCIO to fully implement the Department's ICAM strategy to ensure that the Department meets full Federal government implementation of ICAM. (Repeat Recommendation FY 2018 & FY 2019)	Resolved	10/31/2019	12/30/2019	OCIO

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Deputy Secretary require OCIO to ensure that the network access control solution is fully implemented to ensure identification and authentication of devices connected to the network.	Resolved	10/31/2019	1/8/2020	OCIO
We recommend that the Deputy Secretary require OCIO to validate the inactivity settings to ensure sessions time out after 30 minutes of inactivity.	Completed	10/31/2019	1/8/2020	OCIO
We recommend that the Chief Operating Officer require FSA to fully implement the process for identifying, managing, and tracking activity of privileged user accounts.	Completed	10/31/2019	12/30/2019	OCIO
We recommend that the Chief Operating Officer require FSA to enforce a two-factor authentication configuration for all user connections to systems and applications.	Resolved	10/31/2019	12/30/2019	OCIO
We recommend that the Chief Operating Officer require FSA to create corrective action plans to remedy database vulnerabilities for all database vulnerabilities identified.	Completed	10/31/2019	12/30/2019	OCIO
We recommend that the Chief Operating Officer require FSA to require system owners configure all websites to display warning banners when users login to Departmental resources and ensure that banners include approved warning language by October 31, 2019.	Completed	10/31/2019	12/30/2019	OCIO
We recommend that the Deputy Secretary and the Chief Operating Officer require OCIO and FSA to incorporate additional measures to, at a minimum, achieve Level 3 Consistently Implemented status of the Data Protection and Privacy program.	Resolved	10/31/2019	12/30/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure that Privacy Impact Assessments are reviewed every 2 years.	Completed	10/31/2019	12/30/2019	OCIO
We recommend that the Deputy Secretary require OCIO to incorporate additional measures to, at a minimum, achieve Level 3 Consistently Implemented status of the Security Training program	Resolved	10/31/2019	12/30/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure that all new users complete the mandatory training requirements before they receive access to Departmental systems.	Completed	10/31/2019	12/30/2019	OCIO
We recommend that the Deputy Secretary and Chief Operating Officer require OCIO and FSA to ensure that the process for ensuring completion of role-based training is fully implemented.	Resolved	10/31/2019	1/8/2020	OCIO
We recommend that the Deputy Secretary and the Chief Operating Officer require OCIO and FSA to incorporate additional measures to, at a minimum, achieve Level 3 Consistently Implemented status of the ISCM program.	Resolved	10/31/2019	12/30/2019	OCIO
We recommend that the Deputy Secretary require OCIO to automate its capabilities for monitoring the security controls effectiveness and overall implementation of the ISCM Roadmap. (Repeat Recommendation FY 2018 & FY 2019)	Resolved	10/31/2019	12/30/2019	OCIO
We recommend that the Deputy Secretary require OCIO to ensure the completion of Phases 1 and 2 of the CDM program. (Repeat Recommendation FY 2018 & FY 2019)	Resolved	10/31/2019	12/30/2019	OCIO
We recommend that the Deputy Secretary require OCIO to implement a process that ensures data reported on the Cybersecurity Framework Risk Scorecard is accurate.	Resolved	10/31/2019	1/8/2020	OCIO
We recommend that the Deputy Secretary require OCIO to incorporate additional measures to, at a minimum, achieve Level 3 Consistently Implemented status of the Incident Response program.	Resolved	10/31/2019	12/30/2019	OCIO

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Deputy Secretary require OCIO to ensure that incidents are consistently submitted to the OIG within the required timeframe.	Resolved	10/31/2019	1/8/2020	OCIO
We recommend that the Deputy Secretary require OCIO to ensure that data loss prevention technologies work as intended for the blocking of sensitive information transmission.	Completed	10/31/2019	12/30/2019	OCIO
We recommend that the Chief Operating Officer require FSA to incorporate additional measures to, at a minimum, achieve Level 4 Managed and Measurable status of the Contingency Planning program.	Resolved	10/31/2019	12/30/2019	OCIO
We recommend that the Chief Operating Officer require FSA to ensure that contingency plans, and other artifacts impacting contingency plans, are documented and updated in a consistent and timely manner.	Completed	10/31/2019	12/30/2019	OCIO

Recommendation Status for The Department’s Compliance Under the DATA Act ([A19T0004](#))

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Senior Accountable Official ensure that corrective actions identified by the Department during the audit are implemented, including update the programming code, implement a reconciliation process to test for missing records, and obtain all required data as soon as File C is generated.	Completed	11/13/2019	2/7/2020	OCFO
We recommend that the Senior Accountable Official design, document, and implement a process to ensure that linkages exist between Files C and D2 prior to being certified and submitted to USASpending.gov, including verifying that Financial Assistance Broker Submissions are published by Treasury and that File D2 is complete.	Completed	11/13/2019	2/7/2020	OCFO

Recommendation Status for FY 2019 - Financial Statements Audit – U.S. Department of Education ([A17T0001](#))

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Cost Estimation and Analysis Division design and implement policies and procedures requiring a formalized review, approval, and documentation of key assumption	Completed	11/15/2019	1/14/2020	OCFO

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
updates and risk assessments. This documentation should be at a sufficient level of detail to demonstrate management determinations and rationale for their decisions, and the process for selecting specific assumption values, specifically in cases where management's determination differ from the assumption values supported by the available evidence. The documentation should also address any limitations of the available evidence and how these impact management's determination of selected assumption values.				
We recommend that the Department implement a quality control process to ensure that accounts and associated privileges are properly reviewed and approved prior to creating the account in the system.	Completed	11/15/2019	1/15/2020	OCFO
We recommend that FSA implement a quality control process to ensure that user accounts and associated privileges are properly reviewed and approved prior to creating the account in the system.	Resolved	11/15/2019	1/15/2020	OCFO
We recommend that FSA implement processes and procedures to timely deactivate separated users' accounts.	Resolved	11/15/2019	1/15/2020	OCFO
We recommend that FSA perform comprehensive user access reviews and confirm the access lists received for review by designated management are complete and accurate prior to commencing the review.	Completed	11/15/2019	1/15/2020	OCFO
We recommend that FSA prevent or limit developer access in the production environment to read-only.	Resolved	11/15/2019	1/15/2020	OCFO
We recommend that FSA evaluate its change/configuration management process ensuring that it is completely and accurately capturing all changes throughout the various phases of the change management life cycle. Additionally, identify, implement, and follow a quality control review process to make sure that the change process was completely and accurately followed prior to closing the change ticket.	Resolved	11/15/2019	1/15/2020	OCFO
We recommend that the Department on an annual basis, obtain an annual SOC1, Type 2, report for the core financial management system and consolidated general ledger that covers the appropriate time period for financial reporting operations and includes IT controls in relevant control areas, such as security management, logical and physical access controls, change and configuration management, backup, and production control.	Resolved	11/15/2019	1/15/2020	OCFO
We recommend that the Department develop a process to review new and existing contracts with service organizations to require the service organizations to provide appropriate SOC 1, Type 2, reports and bridge letters. Such review should include assessing the relevancy to Department's controls to be tested in the SOC 1 report, the period covered, and understanding of complementary user controls to be performed by the Department.	Resolved	11/15/2019	1/15/2020	OCFO
We recommend that the Department obtain a bridge letter from the service organization on their environment and/or design and operation of the controls covered in the SOC 1 report did not change from the SOC report date through September 30.	Resolved	11/15/2019	1/15/2020	OCFO

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the FSA ensure the contractual requirements are met to obtain the required SOC report(s) and related bridge letter(s) applicable for the user's operational and business needs, to include internal control over financial reporting considerations. The SOC reports, and bridge letters, as applicable, should cover the appropriate time period for the financial reporting operations.	Resolved	11/15/2019	1/15/2020	OCFO
We recommend that the FSA review and revise, as necessary, contracts with service organizations to ensure appropriate SOC 1, Type 2, reports and bridge letters are required.	Completed	11/15/2019	1/15/2020	OCFO
We recommend that the FSA consider additional controls for new service organizations to set proper expectations and needs of the user entity with respect to SOC 1, Type 2, reports.	Completed	11/15/2019	1/15/2020	OCFO
We recommend that the FSA 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.	Completed	11/15/2019	1/15/2020	OCFO

Recommendation Status for FY 2019 - Financial Statements Audit – Federal Student Aid ([A17T0002](#))

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that the Cost Estimation and Analysis Division design and implement policies and procedures requiring a formalized review, approval, and documentation of key assumption updates and risk assessments. This documentation should be at a sufficient level of detail to demonstrate management determinations and rationale for their decisions, and the process for selecting specific assumption values, specifically in cases where management's determination differ from the assumption values supported by the available evidence. The documentation should also address any limitations of the available evidence and how these impact management's determination of selected assumption values.	Completed	11/15/2019	1/3/2020	FSA
We recommend that the Department implement a quality control process to ensure that accounts and associated privileges are properly reviewed and approved prior to creating the account in the system.	Completed	11/15/2019	1/3/2020	FSA
We recommend that FSA implement a quality control process to ensure that user accounts and associated privileges are properly reviewed and approved prior to creating the account in the system.	Resolved	11/15/2019	1/3/2020	FSA
We recommend that FSA implement processes and procedures to timely deactivate separated users' accounts.	Resolved	11/15/2019	1/3/2020	FSA

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
We recommend that FSA perform comprehensive user access reviews and confirm the access lists received for review by designated management are complete and accurate prior to commencing the review.	Completed	11/15/2019	1/3/2020	FSA
We recommend that FSA prevent or limit developer access in the production environment to read-only.	Resolved	11/15/2019	1/3/2020	FSA
We recommend that FSA evaluate its change/configuration management process ensuring that it is completely and accurately capturing all changes throughout the various phases of the change management life cycle. Additionally, identify, implement, and follow a quality control review process to make sure that the change process was completely and accurately followed prior to closing the change ticket.	Resolved	11/15/2019	1/3/2020	FSA
We recommend that the Department on an annual basis, obtain an annual SOC1, Type 2, report for the core financial management system and consolidated general ledger that covers the appropriate time period for financial reporting operations and includes IT controls in relevant control areas, such as security management, logical and physical access controls, change and configuration management, backup, and production control.	Completed	11/15/2019	1/3/2020	FSA
We recommend that the Department develop a process to review new and existing contracts with service organizations to require the service organizations to provide appropriate SOC 1, Type 2, reports and bridge letters. Such review should include assessing the relevancy to Department's controls to be tested in the SOC 1 report, the period covered, and understanding of complementary user controls to be performed by the Department.	Completed	11/15/2019	1/3/2020	FSA
We recommend that the Department obtain a bridge letter from the service organization on their environment and/or design and operation of the controls covered in the SOC 1 report did not change from the SOC report date through September 30.	Completed	11/15/2019	1/3/2020	FSA
We recommend that the FSA ensure the contractual requirements are met to obtain the required SOC report(s) and related bridge letter(s) applicable for the user's operational and business needs, to include internal control over financial reporting considerations. The SOC reports, and bridge letters, as applicable, should cover the appropriate time period for the financial reporting operations.	Resolved	11/15/2019	1/3/2020	FSA
We recommend that the FSA review and revise, as necessary, contracts with service organizations to ensure appropriate SOC 1, Type 2, reports and bridge letters are required.	Completed	11/15/2019	1/3/2020	FSA
We recommend that the FSA consider additional controls for new service organizations to set proper expectations and needs of the user entity with respect to SOC 1, Type 2, reports.	Completed	11/15/2019	1/3/2020	FSA
We recommend that the FSA 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.	Completed	11/15/2019	1/3/2020	FSA

Recommendation Status for Federal Student Aid’s Oversight of the Heightened Cash Monitoring Payment Methods ([A03Q0006](#))

Text of Open Recommendations	Recommendation Status	Final Report Issue Date	Recommendation Resolution Date	Office
<p>We recommend that the Chief Operating Officer for FSA develop and implement controls to reasonably ensure that FSA:</p> <p>a. Identifies all schools on its “Cite Letter Report” that fail to submit financial statements when due and, tracks School Divisions’ disposition of all the schools identified on the “Cite Letter Report” to ensure that, as applicable, cite letters are issued in a timely manner.</p> <p>b. When warranted places schools that have not submitted a required financial statement when due on provisional certification and heightened cash monitoring in a timely manner.</p> <p>c. Tracks a school’s method of payment status from the School Division’s recommendation for heightened cash monitoring placement until the change in the school’s method of payment status is implemented.</p>	Unresolved	2/27/2020	Unresolved	FSA
<p>We recommend that the Chief Operating Officer for FSA instruct School Division staff that a school that receives a single audit exemption for its compliance audit is still required to submit its financial statements within 6 months after the close of the school’s fiscal year.</p>	Resolved	2/27/2020	3/19/2020	FSA
<p>We recommend that the Chief Operating Officer for FSA improve its internal controls over document retention by having management confirm that staff have scanned and retained all heightened cash monitoring documentation in accordance with policies and procedures.</p>	Resolved	2/27/2020	3/19/2020	FSA

Acronyms Used in This Report

AFR	Agency Financial Report	SAP	Satisfactory Academic Progress
APR	Annual Performance Report	SEA	State Educational Agency
BIA	Business Impact Assessment	SOC	System and Organization Controls
CDM	Continuous Diagnostics and Mitigation	TLS	Transport Layer Security
CIO	Chief Information Officer	US-CERT	United States Computer Emergency Readiness Team
CISO	Chief Information Security Officer		
CMO	Charter Management Organization		
COR	Contracting Officer's Representative		
CSAM	Cyber Security Assessment and Management		
CSP	Charter Schools Program		
Department	U.S. Department of Education		
ERM	Enterprise Risk Management		
FAFSA	Free Application for Federal Student Aid		
FERPA	Family Educational Rights and Privacy Act		
FITARA	Federal Information Technology Acquisition Reform Act		
FSA	Federal Student Aid		
GPRA	Government Performance and Results Act		
ICAM	Identity, Credential, and Access Management		
IDEA	Individuals with Disabilities Education Improvement Act of 2004, Part B		
ISCM	Information Security Continuous Monitoring		
ISSO	Information System Security Office		
IT	Information Technology		
LEA	Local Educational Agency		
OCFO	Office of the Chief Financial Officer		
OCIO	Office of the Chief Information Officer		
OESE	Office of Elementary and Secondary Education		
OGC	Office of the General Counsel		
OIE	Office of Indian Education		
OIG	Office of Inspector General		
OII	Office of Innovation and Improvement		
OM	Office of Management		
OMB	Office of Management and Budget		
OPE	Office of Postsecondary Education		
OSERS	Office of Special Education and Rehabilitative Services		
PEPS	Postsecondary Education Participants System		
PO	Program Officer		
POA&M	Plan of Action and Milestones		
RMS	Risk Management Services		