

Federal Retirement Thrift
Investment Board (FRTIB)
Audit of the Effectiveness of FRTIB's
Information Security Program under
Federal Information Security
Modernization Act (FISMA) of 2014

Board Meeting February 23, 2021



Agenda

- Objective and Scope
- Audit Results Overview
- Evaluation Method
- Domain Ratings
- Root Causes
- Recommendations
- Next Steps



Objective and Scope

- Determine the effectiveness of FRTIB's information security program for Fiscal Year 2020 (October 1, 2019 – September 30, 2020)
- Assess management's remediation effort to address prior year recommendations
- Evaluate a combination of entity wide and system specific controls with a particular focus on three of FRTIB's information systems:
 - Financial and Reconciliation Services (FRS)
 - FRTIB Domain General Support System (GSS)
 - Identity, Credential, and Access Management (ICAM)

Audit Results Overview

- FRTIB has made significant improvements to its information security governance structure and implementation of the risk management framework resulting in an effective organization-wide information security program in FY 2020
- FRTIB's information security program achieved a Level 4 (Managed and Measurable) maturity rating in seven (7) of eight (8) FISMA domains

Evaluation Method

FY 2020 Inspector General (IG) Reporting Metrics

- Align with the NIST Cybersecurity Framework for five function areas and eight underlying domains
- Ratings throughout the eight domains will be determined by a simple majority, where the most frequent level (i.e., the mode) across the questions will serve as the domain rating

FISMA Maturity Model

 Foundational levels ensure that agencies develop sound policies and procedures, and the advanced levels capture the extent that agencies institutionalize those policies and procedures

Evaluation Method – FISMA Functions

Identify

Risk Management

Protect

- Configuration Management
- Identity and Access Management
- Data Protection and Privacy
- Security Training

Detect

Information Security Continuous Monitoring

Respond

• Incident Response

Recover

Contingency Planning

Evaluation Method – Maturity Model

Level 1: Ad-Hoc

Policies, procedures, and strategies are not formalized; activities are performed in an ad-hoc, reactive manner

Level 2: Defined

Policies, procedures, and strategies are formalized and documented but not consistently implemented.

Level 3: Consistently Implemented

Policies,
procedures, and
strategies are
consistently
implemented, but
quantitative and
qualitative
effectiveness
measures are
lacking

Level 4: Managed and Measurable

Quantitative and qualitative measures on the effectiveness of policies, procedures, and strategies are collected across the organization and used to assess them and make necessary changes

Level 5: Optimized

Policies, procedures, and strategies are fully institutionalized, repeatable, self-generating, consistently implemented, and regularly updated based on a changing threat and technology landscape and business/mission needs.

Domain Ratings – Year to Date

FISMA Function	FISMA Domains	FY 2019 Rating	FY 2020 Rating
Identify	Risk Management	Level 2	Level 4
Protect	Configuration Management	Level 3	Level 4
Protect	Identity and Access Management	Level 3	Level 4
Protect	Data Protection and Privacy	Level 3	Level 4
Protect	Security Training	Level 2	Level 4
Detect	ISCM	Level 2	Level 4
Respond	Incident Response	Level 3	Level 4
Recover	Contingency Planning	Level 1	Level 2

Domain Ratings – FY 2017 to FY 2020



Root Causes

- Williams Adley believes that the conditions identified as a part of the FY 2020 FISMA are due to the following reasons:
 - Plan of Action and Milestones (POA&M) are not yet tracked and managed within Telos Xacta to support FRTIB's POA&M process because the agency needs to reconcile its legacy POA&Ms to eliminate similar or duplicate entries
 - FRTIB has not defined the method(s) to obtain data supporting account recertification and metrics analysis activities in a manner which ensures their accuracy, completeness, and consistency
 - Human error during the performance of defined processes

Recommendations

- Williams Adley provides the following recommendations:
 - Recommendation 1: Update and reconcile legacy POA&Ms prior to their migration into Telos Xacta to ensure that all required fields are complete and duplicate POA&Ms are eliminated
 - Recommendation 2: Define the process to obtain data supporting account recertification and metrics analysis activities in a manner which ensures their accuracy, completeness, and consistency

Next Steps

- Evaluate the implementation of FRTIB's information security program across the remaining systems and any newly introduced systems
- Evaluate the improvements made to address outstanding recommendations and reporting metrics which didn't reach Level 4, where applicable



THANK YOU!

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