National Aeronautics and Space Administration

Office of Inspector General
Washington, DC 20546-0001

June 4, 2009

TO: Assistant Administrator, Office of Security and Program Protection
           Chief Information Officer

FROM: Assistant Inspector General for Auditing

SUBJECT: Addendum to Final Report, "NASA's Processes for Providing Personal
           Identity Verification (PIV) Cards Were Not Completely Effective in
           Meeting Federal Requirements" (Report No. IG-09-015, April 27, 2009)

We requested additional management comments on the subject final report because we
did not consider the comments on two recommendations to be responsive. One
recommendation involved ensuring that future information technology (IT) projects are
planned and managed in accordance with NASA requirements, and the other dealt with
conducting and documenting a gap analysis when ongoing projects are impacted by
Federal requirements. We received additional management comments on May 26, 2009
(see the Enclosure), that are responsive and, therefore, both recommendations are
resolved and closed.

Future IT Projects

In our draft report, we recommended that the NASA Chief Information Officer (CIO) and
the Assistant Administrator for the Office of Security and Program Protection (OSPP)
follow Agency policy documented in NASA Procedural Requirements (NPR) 2800.1 and
NPR 7120.7 to plan and manage the development of future IT projects.

NASA management stated in its April 20, 2009, response to the draft report that NASA's
component projects that comprised NASA's HSPD-12-compliant identification
verification system[1] were all planned and managed according to project management
policy. While NASA's Office of the Chief Information Officer (OCIO) and OSPP
concurred with the recommendation, the response did not indicate how OCIO and OSPP
plan to ensure future IT projects would be planned and managed in accordance with
NPR 2800.1 and NPR 7120.7. Therefore, in our final report, we requested additional
comments to more specifically address how the Agency plans to ensure that future IT
projects are planned and managed in accordance with NASA project management
policies.

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[1] On August 27, 2004, the President signed Homeland Security Presidential Directive 12 (HSPD-12),
"Policy for a Common Identification Standard for Federal Employees and Contractors," which mandated
that all Federal agencies develop and deploy an identification verification system to provide uniform
employee and contractor personal identity verification (PIV) credentials.

NASA management submitted additional comments on May 26, 2009, stating that since the publication of NPR 7120.7 (November 3, 2008), OCIO had made significant progress in ensuring that future IT development projects are planned and managed using applicable NPR guidance and governance. As it pertains to HSPD-12 requirements, OCIO and OSPP are working jointly to institute an overarching governance process for NASA's Identity, Credential and Access Management program. This governance structure will incorporate both OSPP and OCIO governance processes. NASA management further stated that currently IT projects are being assimilated into a Monthly Status Review attended by division heads, program directors, and policy and investment division personnel as a means of monitoring/managing risks and instituting a proactive management posture. Based on management's additional comments, the recommendation is resolved and closed.

Gap Analysis

In our draft report, we recommended that the NASA CIO and the Assistant Administrator for OSPP require system owners to conduct and document a gap analysis when Federal directives and requirements impact ongoing IT project development.

In the Agency's April response to the draft memorandum, NASA management stated that a gap analysis for projects in development was conducted in the form of a business architecture, which documented the overall framework and enabled detailed analysis of as-is versus to-be states. While OCIO and OSPP concurred with the recommendation, the response did not indicate how OCIO and OSPP plan to ensure that system owners conduct and document a gap analysis when Federal directives and requirements impact ongoing IT development projects.

In the additional comments submitted on May 26, 2009, NASA management stated that OCIO, as part of the institutionalization of NPR 7120.7, is developing a requirements framework document that will provide a "handbook/tool" to OCIO projects for documenting and managing requirements. Until the handbook is published, project managers will be apprised of the necessity to document requirements (new and modified) that result from changes in Federal directives. In addition, OCIO and OSPP are working to develop a process, in conjunction with the mission support peers, to assess implications on all affected functional components before completing definition of requirements and designs. On the basis of these comments, the recommendation is resolved and closed.

We appreciate the courtesies extended during our audit. If you have any questions, or need additional information, please contact Ms. Wen Song, Information Technology Director, Office of Audits, at 202-358-2588.

signed

Evelyn R. Klemstine

Enclosure

Management's Additional Comments

National Aeronautics and Space Administration

Headquarters
Washington, DC 20546-0001

May 26, 2009

Reply to Attn of:

Office of Security and Program Protection

TO: Assistant Inspector General for Auditing

FROM: Assistant Administrator, Office of Security and Program Protection

SUBJECT: Additional Response to items 2 and 3 re: Audit Report, "NASA's
           Processes for providing Personal Identity Verification (PIV) cards were
           not completely effective in meeting federal requirements"

Reference: OIG Report No. IG-09-015 (Assignment No. A-08-009-00)

Below is additional information in support of the OIG request as documented in the
overview section of subject Audit Report. Please provide us with a written response as to
the adequacy of these comments no later than Friday, May 29, 2009.

Recommendation 2. The NASA Chief Information Officer and the Assistant
Administrator for the Office of Security and Program Protection should follow Agency
policy documented in NPR 2800.1 and NPR 7120.7 to plan and manage future
development of IT projects.

Management's Response. The Office of the Chief Information Officer and the Office of
Security and Program Protection concurred with the recommendation and stated that
component projects that comprised the HSPD-12 were all planned and managed
according to project management policy

Evaluation of Management's Response. While NASA OCIO and OSPP concurred with
the recommendation, the comments were not responsive. As discussed in the report,
NASA had not updated ongoing project related documents to include HSPD-12
requirements. Management's response did not indicate how OCIO and OSPP plan to
ensure that future IT development projects are planned and managed in accordance with
NPR 2800.1 and NPR 7120.7. We consider the recommendation to be unresolved and
request that the Assistant Administrator, Office of Security and Program Protection, and
the NASA Chief Information Officer provide comments to this final report.

Response to the Evaluation: OCIO is currently managing its IT projects in accordance
with NPR 7120.7 and 2800.1 The OCIO has substantially matured its project
management processes since the time frame of the projects that were assessed in this
review. The complete transformation process of the OCIO that occurred through 2007
led to new governance processes and boards for all OCIO sponsored work.

More specifically, since the publication of NPR 7120.7 (November 3, 2008), the OCIO has made significant progress in ensuring that future IT development projects are planned and managed using applicable NPR guidance and governance.

OCIO is responsible for the implementation of NPR 7120.7 processes and, in only a few months, the majority of OCIO project's schedules, project plans and related documentation is monitored, stored in an enterprise repository, and reviewed in standard lifecycle as well as regularly scheduled Key Decision Point (KDP) reviews. The IT Project Management Board reviews projects during KDPs. Currently projects are being incrementally assimilated into a Monthly Status Review attended by Division heads, Program Directors, and Policy and Investment division personnel as a means of monitoring/managing risks and instituting a pro-active management posture.

As it pertains to HSPD-12 requirements, OCIO and OSPP are working jointly to institute an overarching governance process for the Identity, Credential and Access Management (ICAM) program. This governance structure will fold into both OSPP and OCIO governance processes as well as provide input into crosscutting functional requirements for mission support infrastructure, managed through the Mission Business Systems Integration Board (MBSIG) and reporting to the Operations Management Council (OMC) for NASA. ICAM is the instantiation of the business processes and technology architecture that allows the tenets of HSPD-12 to be realized. As we move forward in assessing what future projects may be necessary to build out additional functionality, we will use the NPR 7120.7 processes. A Monthly Status Review (MSR) attended by OSPP and OCIO management was initiated the beginning of this calendar year. This has proved useful in assuring sound management of budget, risks, issues and priorities.

Recommendation 3. The NASA Chief Information Officer and the Assistant Administrator for the Office of Security and Program Protection should require system owners to conduct and document a gap analysis when Federal directives and requirements impact ongoing IT project development.

Management's Response. The Office of the Chief Information Officer and the Office of Security and Program Protection concurred with the recommendation and stated that a gap analysis of projects in development was conducted in the form of a business architecture, which documented the overall framework and enabled detailed analysis of the as-is versus the to-be states.

Evaluation of Management's Response. While OCIO and OSPP concurred with the recommendation, the comments were not responsive. The business architecture provided to OIG during the audit did show the "as is" and "to be" framework, but it did not show the gaps, in terms of the actual requirements and components, between what NASA was developing and what was needed to meet the HSPD-12 mandate. Management's response did not indicate how OCIO and OSPP plan to ensure that system owners conduct and document a gap analysis when Federal directives and requirements impact ongoing IT development projects. We consider the recommendation to be unresolved and request that the OSPP Assistant Administrator and the NASA CIO provide comments to this final report.

Response to the Evaluation: The MBSIG, working in accordance with the Concept of Operations for NASA Business System (Oct 2008), actively reviews and processes business system gaps. In addition to that group, the OCIO, as part of the institutionalization of NPR 7120.7, is currently developing (working draft status) a Requirements Framework document that will provide a "handbook/tool" to OCIO projects for documenting and managing requirements. Until the handbook is published, project managers will be apprised of the necessity to document requirements (new and modified) that result from changes in Federal directives.

The OSPP was recently added as a full member of the MBSIG. In addition, the OCIO and OSPP are working to develop a process, in conjunction with our mission support peers, e.g., OCFO, OHCM and OP, to assess implications on all affected functional components prior to providing requirements and designs to the NEACC. OSPP just recently added contractor support to assist in updating its policy documents. Part of the initial task is to compile a traceability matrix of functions NASA performs relative to HSPD-12 back to their Federal requirement. This will provide a basis for formulating and promulgating policy that is substantiated by Federal requirements.

If you have any questions, please contact Terry Conroy on 202.358.5183 or at terry.conroy@nasa.gov.

Thank you.

Bradley Waits

for Jack L. Forsythe

cc:
OCIO/Mr. Hecker
OCIO/Ms. Petraska
OCIO/Ms. Irwin
OSPP/Ms. Conroy
OSPP/Dr. Martin