

OFFICE of INSPECTOR GENERAL

Date : June 28, 2011

Reply to

Attn of : Office of Inspector General (OIG)

Subject : Management Letter OI 11-01: Unsupported

To : David S. Ferriero, Archivist of the United States (N)

In December 2010, a complainant contacted OIG Office of Investigations to share a concern

regarding the	used to	on NARA's
network. Specifically, the complainant was concerne	ed that	1. Sec.

would no longer receive software updates including critical security updates. The OIG performed an inquiry into this matter to (1) determine the facts surrounding (2) assess the potential effects resulting from the use of unsupported (3) determine what steps NARA has taken to address risks resulting from the use of unsupported (4) determine factors that contributed to NARA's continued use of unsupported and (5) determine steps that NARA is taking to replace software including timeframes for deployment of replacement software.

The purpose of this management letter is to formally advise you of the results of that inquiry. The claim was substantiated in that we found for

, and the vast majority of PCs connected to the NARA network use this . As a result, software updates including critical security updates from

are not being applied to these PCs. We found that management in the Office of Information Services (NH)¹ has been aware of this condition for some time and that, while some steps have been taken to mitigate the increased risk resulting from this condition, a replacement

has not yet been identified. On April 7, 2011, we sent an email message to the Deputy Chief Information Officer (DCIO), requesting additional information about this matter. On April 13, 2011, we received a written response from the DCIO. We have referenced responses to our questions in this management letter where appropriate and have attached a complete copy of the DCIO's response.

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¹ Issues identified in this management letter initially arose prior to the agency-wide reorganization. Thus, a determination was made to employ acronyms and titles which existed at that time.

Majority of workstations connected to the NARA network use longer supported by the manufacturer

that is no

In early	reported that support for t	he
	. In the peri	od leading up to the end of support
date, repeated	y reminded users that support would b	e ending and encouraged users to
either upgrade to the	or	as soon as
possible. form	ally discontinued support for the	
on stated that	In the	on that date,
We used determine if workstation	a network management tool install	

determine if workstations connected to the network are using the	and the second
and, if so, how many PCs are using	We discovered that the
vast majority of workstations connected to NARA network are using the	
	at NARA has almost five-
thousand workstations deployed. For these workstations, reports that	at four-thousand seven
hundred and nine (4,709) of the workstations use the unsupported	
, that two-hundred sixteen (216) workstations use the	
, and that two (2) use the	

Use of an unsupported operating system increases risk to the network

The primary concern expressed by the complainant is that, since PCs connected to the NARA network are using sector of the workstations would no longer receive software updates. Software updates frequently include critical security updates that patch known vulnerabilities and can help protect computers from security field that applying patches to systems is one of the most effective ways of reducing the risk of malware incidents and that many instances of malware have succeeded because systems were not patched in a timely manner.

We used to examine the state of pa	tch application on PCs	connected to the	
network. We discovered that, in the period leading up	o to PCs	on the network were	
generally receiving patches that were categorized as c	ritical security updates	for In	
fact, the patch that was released by			
was applied to for	our-thousand seven-hur	ndred and forty eight	
(4,748) of the PCs connected to the network and was not applied to fifty-five (55) workstations.			
After that date, we identified a sharp drop-off of patches being applied to PCs connected to the			
network. For example, on	released the	to address	
a that could allow		In the executive	
summary description for this patch,			
	Although it was	known that this	

vulnerability affected PCs using the discovered that the patch was applied to just one-hundred thirty four (134) PCs connected to the network. We identified thirty-six patches identified as critical security updates for and did not identify any instance in which more than one-hundred seventy-two (172) PCs connected to the NARA network received the patch.

We requested information on risk mitigation in our questions to the DCIO. In his response, the DCIO reported that NH has taken several steps to address the additional risks including developing an mitigation strategy, upgrading all public access PCs to mitigation strategy, upgrading all public access PCs to mitigation strategy, the matter on a weekly basis. With respect to specific critical patches, the DCIO provided the following information:

"Since went out of support, critical patches² have been released. Since these patches address vulnerabilities to the patch releases for remediation strategies in our environment. NITTSS has a process to review the patch releases for remediation strategies in our environment. Mitigation strategies have been applied to remediate vulnerabilities for the patch releases. Possible workarounds have been identified for the others, but need to be reviewed for business impact before moving forward with the remediation. The remaining workarounds would have an unacceptable impact to the functionality and NARA is accepting the risk."

NH is considering options for replacing the unsupported

As part of this inquiry, we requested information on the planning process related to the replacement of the At the time of our inquiry in late we were informed that a test plan had been prepared to evaluate and but that testing had not started. We were also advised that testing would take approximately to complete (meaning that testing would be completed in a but that a technical recommendation would be provided to the Technical Review Group at the completion of testing.

NH Management has delayed the selection and deployment of a supported because of other priorities

In our request for information from the DCIO, we asked why it has taken NARA so long to plan for the replacement of In his response, the DCIO explained that planning started late in The DCIO recounted several instances in which NH management considered upgrading from from the DCIO recounted several instances in

and made the decision not to take action. We asked if NARA considered upgrading to when it was released in

² It should be noted that we did not attempt to reconcile the number of critical patches that we identified in our examination of critical patches (critical patches) with the number of critical patches reported by the Deputy CIO in his response (critical patches). Further, we did perform additional research as part of this inquiry into the remediation strategy employed by NH as described in the Deputy CIO's response.

following response:

"The Office of Information Services (NH) has a fundamental assumption with regard to managing risk that is outlined in NARA's Enterprise Architecture (EA). Specifically, Assumption 1 – We will manage IT risk with the rationale being that '... NARA prefers a conservative approach to IT system deployment ...' and 'NARA generally does not want to be an early adopter of new technologies ...' However, NH did consider upgrading to as part of the PC refresh project. This was reviewed with the NH TRG on

. However, at this point it was still generally considered too early to deploy due to concerns about the initial release of the state of and the impact it would have on some of our critical business applications because of known issues with the "

We were also informed in the DCIO's response that a number of other priority projects were ongoing during this timeframe including

upgrade.

Conclusion

We determined that the	e vast majority of PCs connected to the NAR.	A network use the		
	We confirmed that	is no		
longer	and, as a result, PCs using	no longer receive		
software updates	including critical security updates.	. We determined that PCs that		
do not receive security	updates are at an increased risk from			
We determined that NH has taken steps to mitigate the increased risk, but we question				
the timeliness and effectiveness of an internal remediation process as compared to regular security				
updates from	NH management reported that they are tak	king steps to evaluate possible		
replacements for	but that no decision h	has been made on a replacement		
. We were advised that the evaluation process will not be completed until				
. We were informed by NH management that they have been planning for the replacement				
of the	for almost	but have delayed the		
selection and impleme	ntation of a replacement be	cause of concerns about the		
impact of a new	in our environment and because of	of other priorities.		

I have referred this issue to my Office of Audit for consideration as part of the audit planning process. Should you have any questions or require any additional information about this matter after you have had an opportunity to review this management letter, please e-mail me or Ross Weiland, AIGI, or call us at (301) 837-3000.

Paul Brachfeld Inspector General The attachment to Management Letter OI 11-01 has been redacted in full.

at.