

DISTRICT OF COLUMBIA OFFICE OF THE INSPECTOR GENERAL

OIG Project No. 23-E-03-TOO



November 2023

Evaluation of the District's Use of Cybersecurity Waivers

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November 15, 2023

Dr. Christopher Rodriguez
Acting Chief Technology Officer
Office of the Chief Technology Officer
200 I Street SE, 5th Floor
Washington, DC 20003

Subject: **Public Letter – Evaluation of the District’s Use of Cybersecurity Waivers**
23-E-03-TOO

Dear Chief Technology Officer Rodriguez:

The Office of the Inspector General (OIG) has completed its *Evaluation of the District’s Use of Cybersecurity Waivers* (OIG Project 23-E-03-TOO). We provided you with a comprehensive report on October 31, 2023. Due to the sensitive nature of our evaluation, the final report will not be made available to the public, consistent with DC Code § 2-534(a)(10). However, this letter provides you and the public with an overview of our evaluation and the subsequent responsive actions taken by the Office of the Chief Technology Officer (OCTO).

The objectives of this evaluation were to (1) identify all cybersecurity waivers OCTO approved since October 1, 2019; (2) assess OCTO’s processes for evaluating, documenting, and awarding cybersecurity waivers to District agencies; (3) determine whether District agencies properly implemented the requirements of the cybersecurity waivers issued since October 1, 2019; and (4) determine whether OCTO followed up with agencies to assess their compliance with the waiver they received.

We conducted this evaluation in accordance with the Council of the Inspectors General on Integrity and Efficiency’s (CIGIE) *Quality Standards for Inspection and Evaluation*.¹ We gained an understanding of the agency’s internal controls within the context of the evaluation objectives using the US Government Accountability Office’s (GAO) *Standards for Internal Control in the Federal Government*, GAO-14-704G (known as the Green

¹ CIGIE QUALITY STANDARDS FOR INSPECTION AND EVALUATION (2020), <https://www.ignet.gov/sites/default/files/files/QualityStandardsforInspectionandEvaluation-2020.pdf> (last visited Aug. 7, 2023) [hereinafter Blue Book].

Book). The Green Book sets the internal control standards for federal entities and may be adopted by state and local entities as a framework for an internal control system.²

OCTO's cybersecurity waiver program was designed to balance the District's security and risk management needs with agencies' need for flexibility in cybersecurity management to accomplish their respective missions. This complex and constant balancing act necessitated that OCTO develop sufficient internal controls to perform its essential oversight function. We found that OCTO lacked the policies, procedures, and personnel to effectively manage the waiver program, particularly after waiver issuance. However, OIG recognizes OCTO made, and continues to make, improvements to these aspects of the waiver program.

Our confidential report contains 10 recommendations to improve OCTO's internal controls and oversight of the waiver program. OCTO agreed with seven of these recommendations and disagreed with three. OIG notes that in disagreeing with three of our recommendations, OCTO's responses at least partially address the deficiencies OIG found during this evaluation. OIG will continue to work with OCTO to ensure that the agreed-upon recommendations are implemented in a timely manner.

We appreciate your agency's cooperation and courtesy during our evaluation. If you have any questions concerning this report, please contact me or Yulanda Gaither, Assistant Inspector General for Inspections and Evaluations, at yulanda.gaither@dc.gov or (202) 727-9029.

Sincerely,

Marie Hart

for Daniel W. Lucas
Inspector General

DWL/yg

Cc See Distribution List

² U.S. GOV'T ACCOUNTABILITY OFFICE, STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOV'T, GAO-14-704G (2014), <https://www.gao.gov/products/GAO-14-704G> (last visited Nov. 14, 2022) [hereinafter Green Book]

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