

DISTRICT OF COLUMBIA OFFICE OF THE INSPECTOR GENERAL

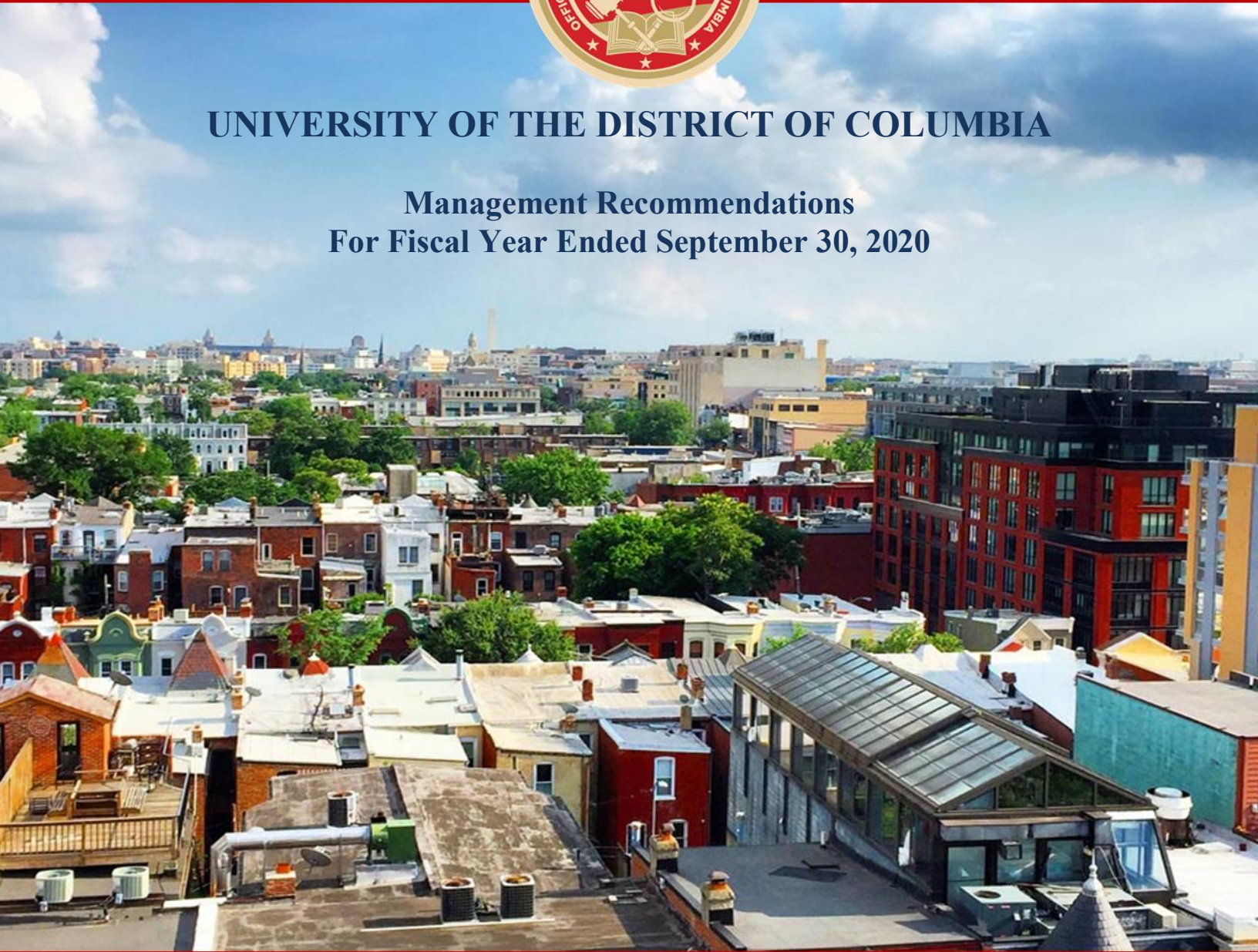
OIG Project No. 21-1-04GG(a)

January 2021



UNIVERSITY OF THE DISTRICT OF COLUMBIA

Management Recommendations
For Fiscal Year Ended September 30, 2020



Guiding Principles

*Workforce Engagement * Stakeholders Engagement * Process-oriented * Innovation
* Accountability * Professionalism * Objectivity and Independence * Communication * Collaboration
* Diversity * Measurement * Continuous Improvement*

Mission

Our mission is to independently audit, inspect, and investigate matters pertaining to the District of Columbia government in order to:

- prevent and detect corruption, mismanagement, waste, fraud, and abuse;
- promote economy, efficiency, effectiveness, and accountability;
- inform stakeholders about issues relating to District programs and operations; and
- recommend and track the implementation of corrective actions.

Vision

Our vision is to be a world-class Office of the Inspector General that is customer-focused and sets the standard for oversight excellence!

Core Values

Excellence * Integrity * Respect * Creativity * Ownership
* Transparency * Empowerment * Courage * Passion
* Leadership



GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General

Inspector General



January 29, 2021

The Honorable Muriel Bowser
Mayor of the District of Columbia
Mayor's Correspondence Unit
1350 Pennsylvania Avenue, N.W., Suite 316
Washington, D.C. 20004

The Honorable Phil Mendelson
Chairman
Council of the District of Columbia
John A. Wilson Building
1350 Pennsylvania Avenue, N.W., Suite 504
Washington, D.C. 20004


Dear Mayor Bowser and Chairman Mendelson:

Enclosed is the final report entitled *University of the District of Columbia Management Recommendations* report for fiscal year (FY) 2020 (OIG No. 21-1-04GG(a)) by McConnell Jones, LLP (MJ) issued January 5, 2021. MJ submitted this report as part of our overall contract for the audit of the District of Columbia's general-purpose financial statements for FY 2020.

This report sets forth MJ's comments and recommendations intended to improve the effectiveness of internal controls over the University of the District of Columbia (UDC) operations and programs. When addressed, these improvements can increase assurances that the UDC runs its operations efficiently and effectively, reports reliable information about its operations, and complies with applicable laws and regulations. The report also includes MJ's summary of prior year management recommendations and the corresponding implementation status.

If you have questions about this report, please contact me or Fekede Gindaba, Assistant Inspector General for Audits, at (202) 727-2540.

Sincerely,


Daniel W. Lucas
Inspector General

DWL/ws

Enclosure

cc: See Distribution List

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UNIVERSITY OF THE DISTRICT OF COLUMBIA
(A Component Unit of the Government of
the District of Columbia)

MANAGEMENT RECOMMENDATIONS

FOR THE YEAR ENDED SEPTEMBER 30, 2020

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To the Mayor, Members of the Council of the District of Columbia,
Board of Trustees of the University of the District of Columbia and
Inspector General of the District of Columbia

In planning and performing our audit of the basic financial statements of the University of the District of Columbia (the University), a component unit of the Government of the District of Columbia, and the University of the District of Columbia Foundation, Inc. and the District of Columbia School of Law Foundation, the discretely presented component units of the University, as of and for the year ended September 30, 2020, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, we considered the University's internal controls over financial reporting (internal controls) as a basis for designing audit procedures that were appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the University's internal controls. Accordingly, we did not express an opinion on the effectiveness of the University's internal controls over financial reporting.

Our consideration of internal control was for the limited purpose described in the preceding paragraph and would not necessarily identify all deficiencies in internal control that might be significant deficiencies or material weaknesses, and therefore, there can be no assurance that all deficiencies, significant deficiencies, or material weaknesses have been identified. Although no matter of a material weakness was noted, other recommendations have been noted which we believe will further improve the University's internal controls or operating effectiveness.

A *deficiency* in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A *material weakness* is a deficiency or combination of deficiencies in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

This letter does not affect our report dated January 5, 2021, on the financial statements of the University. Our comments and recommendations, which have been discussed with appropriate members of management, are intended to improve the internal controls or result in other operating improvements.

This report is intended solely for the information and use of the management, Board of Trustees, others within the organization, the Mayor and Members of the Council of the District of Columbia and the Inspector General of the District of Columbia, and is not to be and should not be used by anyone other than these specified parties. We will be pleased to discuss these comments with you and, if desired, to assist you in implementing any of the suggestions.

Washington, D.C.
January 5, 2021

I. CURRENT YEAR FINDINGS

INFORMATION TECHNOLOGY

Finding 2020-1. Control Over Periodic Access Review Does Not Appear to be Operating Effectively

We observed during our walk-through and inquiry of the auditee that periodic user access reviews were not being performed and documented. During our inquiry, it was stated that a review was performed but not documented.

Based on our review of the Banner Security Access document (no date or revision history was provided), the Department Security Officer (DSO) is to complete security reviews quarterly, and an audit of DSOs is conducted annually. We were provided with evidence of the latest user access review conducted on September 8, 2020. However, we determined that a review of users with administrative privileges was not performed.

According to National Institute of Standards and Technology (NIST) Special Publication 800-53, Rev. 4, AC-6(7), user access review is a control to periodically verify that only legitimate users have access to applications or infrastructure. During a user access review, an application business or Information Technology (IT) owner may discover that users who left the enterprise or transferred to another team in the enterprise continue to have access to applications or infrastructure after their access credentials or privileges should have been removed.

The auditee failed to periodically review user access and, at the same time, did not document the reviews they claimed to have carried out in the previous quarters within the audit period.

Performing periodic user access reviews for appropriate layers (i.e., operating system, network database, application, etc.), reduces the risk that users who no longer require access still have access to system resources. It also reduces the risk that users will maintain incompatible access to various systems.

We provided our findings to the University President, and discussed these noted conditions with the University's Compliance Officer, who provided the following written explanation:

Period reviews will be performed of the administrative account privileges every three months.

Recommendation: We recommend the University President ensures that quarterly user access review is performed and documented to identify users who no longer require access and remove or disable said access.

Finding 2020-2. Control Over Performing Vulnerability Scans on a Timely Basis Appears Not to be Operating Effectively

We inquired during our walk-through and found that there is not a process in place to conduct vulnerability scanning over the University of the District of Columbia (UDC) network.

There is no internal vulnerability scanning being conducted over the UDC network. UDC is aware of this and has accepted the risks as they are in the middle of a network redesign that has been ongoing for 18 months.

According to NIST SP 800-53, Rev. 4, RA-5, scans for vulnerabilities in the information system and hosted applications are performed based on the defined frequency established by the UDC Vulnerability Management Policy. The scan detects and classifies system weaknesses in computers, networks, and network devices and predicts the effectiveness of countermeasures or safeguards.

Management has been aware of the current situation and have accepted the risks while working on a network redesign.

Failure to perform such internal scans increases the risks of system compromise associated with the exploitation of system vulnerabilities.

We provided our findings to the University President, and discussed these noted conditions with the University's Executive Director of Information Services and Management, who provided the following written explanation:

UDC is currently implementing a newly designed network and data center which has impacted every level of network infrastructure from core switching to wireless controllers to edge devices. Because UDC is in the process of removing the technical debt from the current ecosystem and working to establish a defense in depth architecture based on new hardware, software and processes, UDC has chosen not to scan the existing environment until the core components of the infrastructure have been replaced and are stabilized. As such, UDC is aware that there is no current vulnerability scanning strategy in place.

It is expected that all networking components will be updated and installed by June 2021, at which time UDC intends to develop a vulnerability assessment schedule and conduct an initial analysis prior to the conclusion of fiscal year 2021.

Recommendation: We recommend the University President ensures that internal vulnerability scans are performed and that procedures are formalized to remediate identified deficiencies or implement mitigating controls such as insurance.



II. STATUS OF PRIOR YEAR FINDING AND RECOMMENDATION

MANAGEMENT RECOMMENDATION – FY19		
RECOMMENDATION		STATUS
UNIVERSITY OF THE DISTRICT OF COLUMBIA		
1	Ensure Foundation Financial Statements are in Compliance with Generally Accepted Accounting Principles (GAAP)	Implemented