

U.S. Department of Agriculture Office of Inspector General Audit Report

Assessment of USDA's Controls
Over Website Content



Report No. 50601-4-HQ August 2002



UNITED STATES DEPARTMENT OF AGRICULTURE

OFFICE OF INSPECTOR GENERAL

Washington D.C. 20250

August 6, 2002

REPORT TO THE DEPUTY SECRETARY

FROM: Joyce N. Fleischman /s/

Acting Inspector General

SUBJECT: Assessment of USDA's Controls Over Website Content

Report No. 50601-4-HQ

Executive Summary: Our review disclosed that there is an urgent need to establish a sensitive information program in the U. S. Department of Agriculture (USDA) regarding data on USDA websites. Generally, we found that neither the Department nor the agencies had instituted internal controls to preclude the publication of sensitive information over that medium. As a result, physical and/or economic calamity could ensue.

Background: On March 28, 2002, the Acting Director of the Information Security Oversight Office transmitted a March 19 memorandum released by the White House on "Action to Safeguard Information Regarding Weapons of Mass Destruction and Other Sensitive Documents Related to Homeland Security." The document, signed by Andrew H. Card, Assistant to the President and Chief of Staff, included guidance on safeguarding information. The objective of the White House memorandum was to ensure the safeguarding of Government records regarding weapons of mass destruction, including chemical, biological, radiological and nuclear. It covers all Government information, regardless of its age, that could reasonably be expected to assist in the development or use of weapons of mass destruction, including information about the current locations of stockpiles of nuclear materials that could be exploited for use in such weapons. The guidance also extends to any other information that could be misused to harm the security of the Nation and the safety of its people. The memorandum requires that all departments and agencies review their records management procedures and, where appropriate, their holdings of documents to ensure that they are acting in accordance with the guidance.

Objective: To assist the Department in its response to the White House memorandum, the Office of Inspector General (OIG) undertook a review to assess the adequacy of USDA's controls over data promulgated over websites to ensure information that could assist in the development or use of weapons of mass destruction was properly safeguarded.

Scope: We met with or contacted the officials responsible for website content at the following agencies: Office of the Chief Information Officer (OCIO), the Office of Crisis Planning and Management (OCPM), and the Office of Communications (OC).

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We also contacted website officials in USDA agencies including:

Agricultural Research Service
Animal and Plant Health Inspection Service
Cooperative State Research, Education, and Extension Service
Economic Research Service
Farm Service Agency
Food Safety and Inspection Service
Foreign Agricultural Service
Forest Service
Natural Resources Conservation Service
Risk Management Agency

We selected the agencies generally on the basis of what we considered to be the highest vulnerability to publishing sensitive data. We requested the website inventories and evaluated, where available, documentation governing website content.

We also performed a limited review of website data to determine if information that appeared to be sensitive was resident. We did not attempt to trace website "linkages" or non-USDA websites which convey Departmental data throughout their own website network (such as universities). In addition, we did not evaluate security measures in place or those needed to protect website data. The audit was conducted in accordance with <u>Generally Accepted Government Auditing Standards</u>.

Findings: Our review disclosed the following issues for your attention.

USDA Has Not Established a "Sensitive Information" Program For Websites

USDA has not established a program to identify and control the publication of information which could put people, programs, or funding in jeopardy. Although related regulations, such as OCIO's Departmental Regulation 3300-1, "Internet," and OC's draft regulation "Home Page Development and Maintenance," have been issued or are being developed, no formal requirements have been promulgated which provides criteria that defines sensitive information or establishes internal controls to protect such data. Further, the individual agencies generally have not issued their own requirements in this area (though a few agencies indicated they have begun drafting guidance.)

Specifically as it relates to this issue, the Department forwarded an e-mail to the agencies on April 15, 2002, describing the Administration's memorandum. In addition, the USDA Webmaster met with agency representatives on November 7, 2001, and discussed the need for scrubbing websites. No systematic effort was directed by the Department, however, and no follow up was conducted to determine what efforts, if any, were initiated by the agencies. Our discussions with the agencies disclosed that only minimal actions were asserted to have been

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We concluded this condition exists because the responsibility for the administration, operation, and management of a sensitive information program has not been formally designated in USDA. The Secretary has recently established a working group made up of representatives from OCIO, OIG, the Office of the General Counsel, the Office of the Secretary and OCPM to respond to the Administration's memorandum in this regard. The working group developed a first draft of a possible departmental regulation entitled "Control and Protection of 'Sensitive Security Information." This document, which was culled from information received from the Department of Defense and the Department of Justice, represents a good first step to address this critical need in USDA. Our preliminary assessment of the working group's initial draft disclosed that the requirements appear to lack sufficient specificity regarding the types of information that may be considered sensitive. Further, it delegates the determination of sensitivity and the development of control measures to the individual agencies (albeit with approval required from the Office of Crisis Planning and Management).

We agree that website content management falls within the purview of the owners of the data (the individual agencies). In our opinion, however, the Department should set forth specific criteria and examples of information that should be withheld from unencrypted publication, commensurate with the risk and magnitude of the harm resulting from the misuse of the information. In addition, the Department should establish a uniform system of controls that agencies should adhere to, and implement oversight controls to ensure they are being met. A task force should be formed to develop and document these requirements under the direction of the Assistant Secretary for Administration to include representatives from Personnel, Facilities Management, OCIO, and the agencies.

USDA Does Not Maintain a Website Inventory

OIG issued a report entitled "Privacy Considerations Within USDA Agency Internet Sites," (Audit Report No. 50099-30-FM) on May 4, 2001. We found during this audit that the Department did not maintain an inventory of websites and recommended that one be developed. OCIO responded that this recommendation had been met through the issuance of "Interim Guidance on USDA Requirements and the Use of Cookies on Web Pages," on May 22, 2001. During our current review, OCIO directed us to a domain name listing maintained at the National Information Technology Center as USDA's website inventory. These records may include, however, webservers and other non-website systems within each domain. Accordingly, domain names are not synonymous to websites. Nonetheless, our discussions with the agencies disclosed that they generally did not know the precise number of websites they had and, in some cases, could provide only rough guesses. For example, an Agricultural Research Service (ARS) official informed us that ARS has an inventory listing of 140 websites, but may have in excess of 500 total websites. Because they do not have a complete inventory listing, ARS officials cannot be certain as to exactly how many official ARS websites exist.

The first action that needs to be taken to address the sensitive information issue is to establish an

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exact and perpetually current universe of websites.

Sensitive Data May Exist

Although our reviews of websites generally did not disclose information we considered to be sensitive, the lack of controls previously described represent a rating of the highest risk possible that sensitive data could be published. This is particularly true given the ongoing changes to the information published by USDA agencies in that sensitive information not currently included could be subsequently included on websites.

We did find, however, information on the Forest Service (FS) website which appeared to be potentially harmful. This data included the following:

[_]			
1.	The [] and general information on each [] normally used [].			
2.	The different types [].			
3.	The [] of the different types [].			
4.	The names of the contractors [].			
5.	The [] and FS region [] FY 2002 [].			
6.	The assigned [] for the [].			
7.	Special requirements and other limitations for [].			
[_]			
1.	The public website provides [] and general information [] on FS land.			
2.	The website allows the user to "drill" down for information.			
	a. The user can start with [].			
3.	For each [], the user can obtain [] and the [].			

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4. For each [] the user can obtain [].		
5. For each [] the user can obtain [of the specific [1.	

In addition, our discussions with ARS officials disclosed that although they did not know if information existed on their websites that could be used for the purpose of creating weapons of mass destruction, they conceded that such information may be within their web pages.

Recommendations: We propose the following actions be taken to mitigate the concerns noted above:

- 1. Direct all agencies to immediately research their websites for sensitive information and expunge them accordingly.
- 2. Establish a task force to develop specific criteria defining sensitive information and to develop internal controls to preclude the issuance of this data.
- 3. Direct OCIO to develop and maintain an inventory of websites and ensure it is kept current.

Deputy Secretary's Response: The Deputy Secretary's July 30, 2002 response (Attachment 1) expressed agreement with our recommendations and was sufficient to achieve management decision.

MEMORANDUM FROM THE DEPUTY SECRETARY /s/

SUBJECT: Assessment of USDA's Controls Over Website Content /s/

50601-4-HQ

TO: Joyce N. Fleischman

Acting Inspector General

I have reviewed the subject report and agree with its findings and recommendations. The following specific corrective actions have been initiated.

- 1. I have directed the Chief Information Officer, by August 15, 2002, to develop and maintain a current universe of websites and establish internal controls to ensure the universe remains current.
- 2. I have directed the Under and Assistant Secretaries to immediately review their websites and to expunge any data they consider sensitive no later than August 15, 2002. In the absence of stated criteria at this time, they are to err on the side of conservatism.
- 3. I have created a task force composed of representatives from my office, the Office of the General Counsel, Departmental Administration, the Office of the Chief Information Officer, and the USDA Webmasters' Group. In addition, a representative of the Office of Inspector General will serve on this task force as an ex officio member. The task force will develop uniform, common sense criteria by which USDA agencies can challenge or screen out sensitive information that should not be placed on websites. These criteria will be made available to USDA agencies by August 30, 2002, and remain in use until Government-wide criteria/guidance is developed. Departmental agencies will apply these criteria to information currently available on USDA websites and remove any information considered sensitive. Agencies will be instructed to apply these same criteria to the creation of new websites and to any data submitted for addition to current websites. In addition, agencies will be asked to establish controls for reviewing websites on a periodic basis to ensure sensitive data has not been placed on websites.

I appreciate your efforts in this regard.

Attachment 1