

Evaluation of FLRA's Compliance with the FISM/ FY 2022

EVALUATION OF THE FEDERAL LABOR RELATIONS AUTHORITY'S COMPLIANCE WITH THE FEDERAL INFORMATION SECURITY MANAGEMENT ACT FISCAL YEAR 2022

Report No. MAR-22-07 July 2022

Federal Labor Relations Authority 1400 K Street, N.W. Suite 250, Washington, D.C. 20424

CONTENTS

Evaluation	Report
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Results in Bri	ef	1
Background		1
Scope and Mo	ethodology	2
Appendice	S	
Appendix 1:	Prior Year Recommendation	3
Appendix 2:	OIG Responses Reported in Cyberscope	4
Appendix 3:	Report Distribution	5

Abbreviations

Dembo Jones Dembo Jones, P.C.

FISMA Federal Information Security Modernization Act

FLRA Federal Labor Relations Authority

FY Fiscal Year

IG Inspector General

NIST National Institute of Standards and Technology

OMB Office of Management and Budget



Evaluation of the FLRA's Compliance with the FISMA FY 2022 Report No. MAR-22-07 July 26, 2022

The Honorable Ernest DuBester Chairman

Dembo Jones, P.C. (Dembo Jones), on behalf of the Federal Labor Relations Authority (FLRA), Office of Inspector General, conducted an independent evaluation of the quality and compliance of the FLRA security program with applicable Federal computer security laws and regulations. Dembo Jones' evaluation focused on FLRA's information security required by the Federal Information Security Modernization Act (FISMA).

Results in Brief

During our Fiscal Year (FY) 2022 evaluation, we noted that the FLRA has taken significant steps to improve the information security program. We also noted that the FLRA does take information security weaknesses seriously. This year's testing identified no new findings. We followed up on and closed the one prior year open item.

Background

On December 17, 2002, the President signed into law H.R. 2458, the E-Government Act of 2002 (Public Law 107-347). Title III of the E-Government Act of 2002, commonly referred to as FISMA, focuses on improving oversight of Federal information security programs and facilitating progress in correcting agency information security weaknesses. FISMA requires Federal agencies to develop, document, and implement an agency-wide information security program that provides security for the information and information systems that support the operations and assets of the agency. This program includes providing security for information systems provided or managed by another agency, contractor, or other source. FISMA assigns specific responsibilities to agency heads and Inspectors General (IGs). It is supported by security policy promulgated through Office of Management and Budget (OMB), and risk-based standards and guidelines published in the National Institute of Standards and Technology (NIST) Special Publication series.

Under FISMA, agency heads are responsible for providing information security protections commensurate with the risk and magnitude of harm resulting from the unauthorized access, use, disclosure, disruption, modification, or destruction of information and information systems. FISMA directs Federal agencies to report annually to the OMB Director, Comptroller General, and selected congressional

committees on the adequacy and effectiveness of agency information security policies, procedures, and practices and compliance with FISMA. In addition, FISMA requires agencies to have an annual independent evaluation performed of their information security programs and practices and to report the evaluation results to OMB. FISMA states that the independent evaluation is to be performed by the agency IG or an independent external auditor as determined by the IG. Implementing adequate information security controls is essential to ensuring an organization can effectively meet its mission. The IG plays an essential role in supporting Federal agencies in identifying areas for improvement. In support of that critical goal the FLRA supports the development of a strategy to secure the FLRA computing environment which centers on providing confidentially, integrity, and availability.

Scope and Methodology

The scope of our testing focused on the FLRA network General Support System, however the testing also included the others systems in the FLRA system inventory. We conducted our testing through inquiry of FLRA personnel, observation of activities, inspection of relevant documentation, and the performance of technical security testing. Some examples of our inquiries with FLRA management and personnel included, but were not limited to, reviewing system security plans, access control, the risk assessments, and the configuration management processes.

Dembo Jones, P.C.

North Bethesda, Maryland July 26, 2022

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Appendix 1

Prior Year Recommendation

- 1. (Closed) FLRA should develop, review and update, as necessary, the following information security program policies and procedures in accordance with NIST and agency requirements:
 - a. Risk policies and procedures.
 - b. System and Services Acquisition Policy
 - c. Personnel Security policy.
 - d. Security Assessment policy.
 - e. Configuration Management policy.
 - f. Configuration Management Plan.
 - g. Incident Response policy.
 - h. Security Awareness policy.
 - i. Identification and Authentication policy.
 - j. Access policy.
 - k. Mobile Code Usage and Restrictions Policy

Deficiency	
Update the Acquisition policy to ensure that it	Closed
contains stipulations that require external service	
providers meet or exceed the NIST security	
requirements.	
The Configuration Management Plan and policy	Closed
has not been formalized, reviewed and approved.	
Mobile code technologies and usage restrictions	Closed
have not been formally documented in a Policy.	

Inspector General

Section Report

2022

IG Annual

Federal Labor Relations Authority

Function 0: Overall

0.1. Please provide an overall IG self-assessment rating (Effective/Not Effective)

Effective

0.2. Please provide an overall assessment of the agency's information security program. The narrative should include a description of the assessment scope, a summary on why the information security program was deemed effective/ineffective and any recommendations on next steps. Please note that OMB will include this information in the publicly available Annual FISMA Report to Congress to provide additional context for the Inspector General's effectiveness rating of the agency's information security program. OMB may modify the response to conform with the grammatical and narrative structure of the Annual Report.

The FLRA has made significant strides this year. There were no new issues and all of the prior year issues were closed during the current year. For further details regarding the scope, refer to the FLRA FISMA report, which is attached within this submission.

Function 1A: Identify - Risk Management

1. To what extent does the organization maintain a comprehensive and accurate inventory of its information systems (including cloud systems, public facing websites, and third-party systems), and system interconnections? (NIST SP 800-53, Rev. 5: CA-3 and PM-5; NIST Cybersecurity Framework (CSF): ID.AM-1 - 4; FY 2022 CIO FISMA Metrics: 1.1-1.1.5, 1.3; OMB A-130, NIST SP 800-37, Rev. 2: Task P-18; NIST 800-207, Section 7.3; EO 14028, Section 3; OMB M-22-05; OMB M-22-09, Federal Zero Trust Strategy, Section B and D (5); CISA Cybersecurity & Incident Response Playbooks)

Optimized (Level 5)

2. To what extent does the organization use standard data elements/taxonomy to develop and maintain an up-to-date inventory of hardware assets (including GFE and Bring Your Own Device (BYOD) mobile devices) connected to the organization's network with the detailed information necessary for tracking and reporting? (NIST SP 800-53, Rev. 5: CA-7 and CM-8; NIST SP 800-137; NIST IR 8011; NIST 800-207, 7.3.2; Federal Enterprise Architecture (FEA) Framework, v2; FY 2022 CIO FISMA Metrics: 1.2-1.2.3; CSF: ID.AM-1, ID.AM-5; NIST SP 800-37, Rev. 2: Task P-10 and P-16; NIST 800-207, Section 7.3; EO 14028, Section 3; OMB M-22-05; OMB M-22-09, Federal Zero Trust Strategy, Section B; CISA Cybersecurity & Incident Response Playbooks; CIS Top 18 Security Controls v.8: Control 1)

Managed and Measurable (Level 4)

3. To what extent does the organization use standard data elements/taxonomy to develop and maintain an up-to-date inventory of software assets (including GFE and Bring Your Own Device (BYOD) mobile devices) connected to the organization's network with the detailed information necessary for tracking and reporting? (NIST SP 800-53, Rev. 5: CA-7, CM-8, CM-10, and CM-11; NIST SP 800-137; NIST IR 8011; FEA Framework, v2; FY 2022 CIO FISMA Metrics: 1.3 and 4.0; OMB M-21-30; EO 14028, Section 4; OMB

Function 1A: Identify - Risk Management

M-22-05; OMB M-22-09, Federal Zero Trust Strategy, Section B; CSF: ID.AM-2; NIST SP 800- 37, Rev. 2: Task P-10 and P-16; NIST 800-207, Section 7.3; CISA Cybersecurity & Incident Response Playbooks; CIS Top 18 Security Controls v.8: Control 2)

Managed and Measurable (Level 4)

- 4. To what extent has the organization categorized and communicated the importance/priority of information systems in enabling its missions and business functions, including for high value assets (NIST SP 800-53 Rev. 4: RA-2, PM-7, and PM-11; NIST SP 800-60; NIST SP 800-37 (Rev. 2); CSF: ID.BE-3, ID.AM-5, and ID.SC-2; FIPS 199; FY 2022 CIO FISMA Metrics: 1.1; OMB M-19-03; NIST SP 800-37, Rev. 2: Task C-2, C-3, P-12, P-13, S-1 S-3)?
- To what extent does the organization ensure that information system security risks are adequately managed at the organizational, mission/business process, and information system levels? (NIST SP 800-39; NIST SP 800-53, Rev. 5: RA-3 and PM-9; NIST IR 8286; CSF: ID RM-1 ID.RM-3; OMB A-123; OMB M-16-17; OMB M-17-25; NIST SP 800-37 (Rev. 2): Tasks P2, P-3, P-14, R-2, and R-3)

Managed and Measurable (Level 4)

- 6. To what extent does the organization utilize an information security architecture to provide a disciplined and structured methodology for managing risk, including risk from the organization's supply chain (Federal Information Technology Acquisition Reform Act (FITARA), NIST SP 800-39; NIST SP 800-160; NIST SP 800-37 (Rev. 2) Task P-16; OMB M-19-03; OMB M-15-14, FEA Framework; NIST SP 800-53 Rev. 4: PL-8, SA-3, SA-8, SA-9, SA-12, and PM-9; NIST SP 800-161; NIST SP 800-163, Rev. 1 CSF: ID.SC-1 and PR.IP-2; SECURE Technology Act: s. 1326)?
- 7. To what extent have roles and responsibilities of internal and external stakeholders involved in cyber security risk management processes been defined and communicated across the organization (NIST SP 800-39: Section 2.3.1, 2.3.2, and Appendix D; NIST SP 800-53 Rev. 4: RA-1; CSF: ID.AM-6, ID.RM-1, and ID.GV-2; NISTIR 8286, Section 3.1.1, OMB A-123;; NIST SP 800-37 (Rev. 2) Section 2.8 and Task P-1; OMB M-19-03)?
- 8. To what extent has the organization ensured that plans of action and milestones (POA&Ms) are utilized for effectively mitigating security weaknesses (NIST SP 800-53 Rev. 4: CA-5; NIST SP 800-37 (Rev. 2) Task A-6, R-3; OMB M-19-03, CSF v1.1, ID.RA-6)?
- 9. To what extent does the organization ensure that information about cyber security risks is communicated in a timely manner to all necessary internal and external stakeholders (OMB A-123; OMB Circular A-11; Green Book (Principles #9, #14 and #15); OMB M-19-03; CSF: Section 3.3; NIST SP 800-37 (Rev. 2) Task M-5; SECURE Technology Act: s. 1326, NISTIR 8286)?
- 10. To what extent does the organization utilize technology/ automation to provide a centralized, enterprise wide (portfolio) view of cybersecurity risk management activities across the organization, including risk control and remediation activities, dependencies, risk scores/levels, and management dashboards? (NIST SP 800-39; OMB A-123; NIST IR 8286; CISA Zero Trust Maturity Model, Pillars 2-4, NIST 800-207, Tenets 5 and 7; OMB M-22-09, Federal Zero Trust Strategy, Security Orchestration, Automation, and Response)

Function 1A: Identify - Risk Management

Consistently Implemented (Level 3)

Comments: The FLRA did not provide GRC dashboards, threat model exercise reports, continuous monitoring dashboards, and CDM / SIEM output reports.

11.1. Please provide the assessed maturity level for the agency's Identify - Risk Management program.

Managed and Measurable (Level 4)

11.2. Provide any additional information on the effectiveness (positive or negative) of the organization's Risk Management program that was not noted in the questions above. Taking into consideration the overall maturity level generated from the questions above and based on all testing performed, is the risk management program effective?

Function 1B: Identify - Supply Chain Risk Management

- 12. To what extent does the organization utilize supply chain risk management policies and procedures to manage SCRM activities at all organizational tiers (NIST SP 800-37 Rev. 2, Section 2.8, NIST 800-53, SR-1, NIST CSF v1.1, ID.SC-1, NIST 800-161)?
- To what extent does the organization utilize a supply chain risk management plan(s) to ensure the integrity, security, resilience, and quality of services, system components, and systems (OMB A-130, NIST SP 800-37 Rev. 2, Section 2.8, NIST 800-53, SR-2, SR-3; NIST 800-161, section 2.2.4 and Appendix E)?
- 14. To what extent does the organization ensure that products, system components, systems, and services of external providers are consistent with the organization's cybersecurity and supply chain requirements? (The Federal Acquisition Supply Chain Security Act of 2018, NIST SP 800-53, Rev. 5: SA-4, SR-3, SR-5 and SR-6 (as appropriate); NIST SP 800-152; FedRAMP standard contract clauses; Cloud Computing Contract Best Practices; OMB M-19-03; OMB A-130; CSF: ID.SC-2 through 4, NIST IR 8276, NIST 800-218, Task PO.1.3; FY 2022 CIO FISMA Metrics: 7.4.2; CIS Top 18 Security Controls v.8: Control 15)

Defined (Level 2)

Comments: The agency has a Supply Chain Strategic Plan, however the agency needs to go beyond the development of policies and implement the supply chain procedures within the agency.

- 15. To what extent does the organization maintain and monitor the provenance and logistical information of the systems and system components it acquires? (NIST SP 800-53 REV. 5: SR-4 and NIST SP 800-161, Provenance (PV) family)?
 - 16.1. Please provide the assessed maturity level for the agency's Identify Supply Chain Risk Management program.

Defined (Level 2)

16.2. Please provide the assessed maturity level for the agency's Identify Function.

Defined (Level 2)

Function 1B: Identify - Supply Chain Risk Management

Comments: The FLRA has a Supply Chain Strategic Plan and is working towards deploying procedures in the coming year.

16.3. Provide any additional information on the effectiveness (positive or negative) of the organization's Supply Chain Risk Management program that was not noted in the questions above. Taking into consideration the overall maturity level generated from the questions above and based on all testing performed, is the risk management program effective?

Function 2A: Protect - Configuration Management

- 17. To what extent have the roles and responsibilities of configuration management stakeholders been defined, communicated across the agency, and appropriately resourced (NIST SP 800-53 REV. 4: CM-1; NIST SP 800-128: Section 2.4)?
- 18. To what extent does the organization utilize an enterprise wide configuration management plan that includes, at a minimum, the following components: roles and responsibilities, including establishment of a Change Control Board (CCB) or related body; configuration management processes, including processes for: identifying and managing configuration items during the appropriate phase within an organization's SDLC; configuration monitoring; and applying configuration management requirements to contractor operated systems (NIST SP 800-128: Section 2.3.2; NIST SP 800-53 REV. 4: CM-9)?
- 19. To what extent does the organization utilize baseline configurations for its information systems and maintain inventories of related components at a level of granularity necessary for tracking and reporting (NIST SP 800-53 REV. 4: CM-2 and CM-8; FY 2022 CIO FISMA Metrics: 2.2, 3.9.2, and 3.10.1; CSF: DE.CM-7 and PR.IP-1)?
- To what extent does the organization utilize settings/common secure configurations for its information systems? (NIST SP 800-53, Rev. 5: CM-6, CM-7, and RA-5; NIST SP 800-70, Rev. 4; FY 2022 CIO FISMA Metrics, Section 7, Ground Truth Testing; EO 14028, Section 4, 6, and 7; OMB M-22-09, Federal Zero Trust Strategy, Section D; OMB M 22-05; CISA Cybersecurity & Incident Response Playbooks; CIS Top 18 Security Controls v.8, Controls 4 and 7; CSF: ID.RA-1 and DE.CM-8)

Consistently Implemented (Level 3)

Comments: The FLRA did not provide dashboards at the managed and measurable level.

21. To what extent does the organization utilize flaw remediation processes, including patch management, to manage software vulnerabilities? (EO 14028, Sections 3 and 4; NIST SP 800-53, Rev. 5: CM-3, RA-5, SI-2, and SI-3; NIST SP 800-40, Rev. 3; NIST 800-207, section 2.1; CIS Top 18 Security Controls v.8, Controls 4 and 7; FY 2022 CIO FISMA Metrics: Section 8; CSF: ID.RA-1; DHS Binding Operational Directives (BOD) 18-02, 19-02, and 22-01; OMB M-22-09, Federal Zero Trust Strategy, Section D; CISA Cybersecurity Incident and Vulnerability Response Playbooks)

Consistently Implemented (Level 3)

Comments: There was no evidence of using trusted, verified repositories for operating systems. Metrics at the managed and measurable level were also not provided.

Function 2A: Protect - Configuration Management

- 22. To what extent has the organization adopted the Trusted Internet Connection (TIC) program to assist in protecting its network (OMB M-19-26)?
- 23. To what extent has the organization defined and implemented configuration change control activities including: determination of the types of changes that are configuration controlled; review and approval/disapproval of proposed changes with explicit consideration of security impacts and security classification of the system; documentation of configuration change decisions; implementation of approved configuration changes; retaining records of implemented changes; auditing and review of configuration changes; and coordination and oversight of changes by the CCB, as appropriate (NIST SP 800-53 REV. 4: CM-2, CM-3 and CM-4; CSF: PR.IP-3).
- To what extent does the organization utilize a vulnerability disclosure policy (VDP) as part of its vulnerability management program for internet-accessible federal systems (OMB M-20-32 and DHS BOD 20-01)?
 - 25.1. Please provide the assessed maturity level for the agency's Protect Configuration Management program.Consistently Implemented (Level 3)
 - 25.2. Provide any additional information on the effectiveness (positive or negative) of the organization's Configuration Management program that was not noted in the questions above. Taking into consideration the maturity level generated from the questions above and based on all testing performed, is the configuration management program effective?

Function 2B: Protect - Identity and Access Management

- To what extent have the roles and responsibilities of identity, credential, and access management (ICAM) stakeholders been defined, communicated across the agency, and appropriately resourced (NIST SP 800-53 REV. 4: AC-1, IA-1, and PS-1; NIST SP 800-63-3 and 800-63A, B, and C; Federal Identity, Credential, and Access Management Roadmap and Implementation Guidance (FICAM), OMB M-19-17)?
- To what extent does the organization utilize a comprehensive ICAM policy, strategy, process, and technology solution roadmap to guide its ICAM processes and activities (FICAM, OMB M-19-17; NIST SP 800-53 REV. 4: AC-1 and IA-1; OMB M-19-17, Cybersecurity Strategy and Implementation Plan (CSIP); SANS/CIS Top 20: 14.1; DHS ED 19-01; CSF: PR.AC-4 and 5)?
- To what extent has the organization developed and implemented processes for assigning position risk designations and performing appropriate personnel screening prior to granting access to its systems (NIST SP 800-53 REV. 4: PS-2 and PS-3; National Insider Threat Policy; CSF: PR.IP-11, OMB M-19-17)?
- To what extent does the organization ensure that access agreements, including nondisclosure agreements, acceptable use agreements, and rules of behavior, as appropriate, for individuals (both privileged and non-privileged users) that access its systems are completed and maintained (NIST SP 800-53 REV. 4: AC-8, PL-4, and PS-6)?
- 30. To what extent has the organization implemented strong authentication mechanisms (PIV or an Identity Assurance Level

Function 2B: Protect - Identity and Access Management

(IAL)3/Authenticator Assurance Level (AAL) 3 credential) for nonprivileged users to access the organization's facilities [organizationdefined entry/exit points], networks, and systems, including for remote access? (EO 14028, Section 3; HSPD-12; NIST SP 800-53, Rev. 5: AC-17, IA-2, IA-5, IA-8, and PE-3; NIST SP 800-128; FIPS 201-2; NIST SP 800-63, 800-157; FY 2022 CIO FISMA Metrics: Section 2; OMB M-22-05; OMB M-22-09, Federal Zero Trust Strategy, Section A (2); CSF: PR.AC-1 and 6; OMB M19-17, NIST SP 800-157; NIST 800-207 Tenet 6; CIS Top 18 Security Controls v.8: Control 6)

Managed and Measurable (Level 4)

To what extent has the organization implemented strong authentication mechanisms (PIV or an Identity Assurance Level (IAL)3/Authenticator Assurance Level (AAL) 3 credential) for privileged users to access the organization's facilities [organization-defined entry/exit points], networks, and systems, including for remote access? (EO 14028, Section 3; HSPD-12; NIST SP 800-53, Rev. 5: AC-17 and PE-3; NIST SP 800-128; FIPS 201-2; NIST SP 800-63 and 800-157; OMB M-19-17; FY 2022 CIO FISMA Metrics: Section 2; OMB M-22-05; OMB M-22-09, Federal Zero Trust Strategy, Section A (2); CSF: PR.AC-1 and 6; DHS ED 19-01; NIST 800-207 Tenet 6; CIS Top 18 Security Controls v.8: Control 6)

Managed and Measurable (Level 4)

To what extent does the organization ensure that privileged accounts are provisioned, managed, and reviewed in accordance with the principles of least privilege and separation of duties? Specifically, this includes processes for periodic review and adjustment of privileged user accounts and permissions, inventorying and validating the scope and number of privileged accounts, and ensuring that privileged user account activities are logged and periodically reviewed? (EO 14028, Section 8; FY 2022 CIO FISMA Metrics: 3.1; OMB M-21-31; OMB M-19-17; NIST SP 800-53, Rev. 5: AC-1, AC2, AC-5, AC-6, AC-17; AU-2, AU-3, AU-6, and IA-4; DHS ED 19-01; CSF: PR.AC-4; CIS Top 18 Security Controls v.8: Controls 5, 6, and 8)

Consistently Implemented (Level 3)

Comments: No screenshots of automated tools were provided, which are metrics at the managed and measurable level.

- To what extent does the organization ensure that appropriate configuration/connection requirements are maintained for remote access connections? This includes the use of appropriate cryptographic modules, system time-outs, and the monitoring and control of remote access sessions (NIST SP 800-53 REV. 4: AC-11, AC-12, AC-17, AC-19, AU-2, IA-7, SC-10, SC-13, and SI-4; CSF: PR.AC-3; and FY 2022 CIO FISMA Metrics: 2.10 and 2.11).
 - 34.1. Please provide the assessed maturity level for the agency's Protect Identity and Access Management program.

 Managed and Measurable (Level 4)
 - 34.2. Provide any additional information on the effectiveness (positive or negative) of the organization's Identity and Access Management program that was not noted in the questions above. Taking into consideration the maturity level generated from the questions above and based on all testing performed, is the identity and access management program effective?

Function 2C: Protect - Data Protection and Privacy

- To what extent has the organization developed a privacy program for the protection of personally identifiable information (PII) that is collected, used, maintained, shared, and disposed of by information systems (NIST SP 800-122; NIST SP 800-37 (Rev. 2) Section 2.3, Task P-1; OMB M-20-04; OMB M-19-03; OMB A-130, Appendix I; CSF: ID.GV-3; NIST SP 800-53 REV. 4: AR-4 and Appendix J, FY 2020 SAOP FISMA metrics, Sections 1 through 4, 5(b))?
- To what extent has the organization implemented the encryption of data rest, in transit, limitation of transference of data by removable media, and sanitization of digital media prior to disposal or reuse to protect its PII and other agency sensitive data, as appropriate, throughout the data lifecycle? (EO 14028, Section 3(d); OMB M-22-09, Federal Zero Trust Strategy; NIST 800-207; NIST SP 800-53, Rev. 5; SC-8, SC28, MP-3, and MP-6; NIST SP 800-37 (Rev. 2); FY 2022 CIO FISMA Metrics: 2.1, 2.2, 2.12, 2.13; DHS BOD 18-02; CSF: PR.DS-1, PR.DS-2, PR.PT-2, and PR.IP-6; CIS Top 18 Security Controls v. 8: Control 3)

 Managed and Measurable (Level 4)
- To what extent has the organization implemented security controls to prevent data exfiltration and enhance network defenses? (FY 2022 CIO FISMA Metrics, 5.1; NIST SP 800-53, Rev. 5: SI3, SI-7, SI-4, SC-7, and SC-18; DHS BOD 18-01; DHS ED 19- 01; CSF: PR.DS-5, OMB M-21-07; CIS Top 18 Security Controls v.8: Controls 9 and 10)

Consistently Implemented (Level 3)

Comments: No dashboards were provided to show that data exfiltration is prevented within the agency. Also, after action reports and evidence of DNS monitoring was also not provided via evidence at the managed and measurable level.

- To what extent has the organization developed and implemented a Data Breach Response Plan, as appropriate, to respond to privacy events? (NIST SP 800-122; NIST SP 800-53 REV. 4: Appendix J, SE-2; FY 2020 SAOP FISMA metrics, Section 12; OMB M-17-12; and OMB M-17-25)?
- To what extent does the organization ensure that privacy awareness training is provided to all individuals, including role-based privacy training (NIST SP 800-53 REV. 4: AR-5, FY 2020 SAOP FISMA Metrics, Sections 9 10, and 11)
 - 40.1. Please provide the assessed maturity level for the agency's Protect Data Protection and Privacy program.

 Managed and Measurable (Level 4)
 - 40.2. Provide any additional information on the effectiveness (positive or negative) of the organization's Data Protection and Privacy program that was not noted in the questions above. Taking into consideration the maturity level generated from the questions above and based on all testing performed, is the data protection and privacy program effective?

Function 2D: Protect - Security Training

To what extent have the roles and responsibilities of security awareness and training program stakeholders been defined, communicated across the agency, and appropriately resourced? (Note: this includes the roles and responsibilities for the effective

Function 2D: Protect - Security Training

establishment and maintenance of an organization wide security awareness and training program as well as the awareness and training related roles and responsibilities of system users and those with significant security responsibilities (NIST SP 800-53 REV. 4: AT-1; and NIST SP 800-50).

42. To what extent does the organization utilize an assessment of the skills, knowledge, and abilities of its workforce to provide tailored awareness and specialized security training within the functional areas of: identify, protect, detect, respond, and recover? (FY 2022 CIO FISMA Metrics, Section 6; NIST SP 800-53, Rev. 5: AT-2, AT-3, and PM-13; NIST SP 800-50: Section 3.2; Federal Cybersecurity Workforce Assessment Act of 2015; National Cybersecurity Workforce Framework v1.0; NIST SP 800-181; and CIS Top 18 Security Controls v.8: Control 14)

Managed and Measurable (Level 4)

- 43. To what extent does the organization utilize a security awareness and training strategy/plan that leverages its organizational skills assessment and is adapted to its culture? (Note: the strategy/plan should include the following components: the structure of the awareness and training program, priorities, funding, the goals of the program, target audiences, types of courses/material for each audience, use of technologies (such as email advisories, intranet updates/wiki pages/social media, web based training, phishing simulation tools), frequency of training, and deployment methods (NIST SP 800-53 REV. 4: AT-1; NIST SP 800-50: Section 3; CSF: PR.AT-1).
- 44. To what extent does the organization ensure that security awareness training is provided to all system users and is tailored based on its organizational requirements, culture, and types of information systems? (Note: awareness training topics should include, as appropriate: consideration of organizational policies, roles and responsibilities, secure e-mail, browsing, and remote access practices, mobile device security, secure use of social media, phishing, malware, physical security, and security incident reporting (NIST SP 800-53 REV. 4: AT-2; FY 2022 CIO FISMA Metrics: 2.15; NIST SP 800-50: 6.2; CSF: PR.AT-2; SANS Top 20: 17.4).
- To what extent does the organization ensure that specialized security training is provided to all individuals with significant security responsibilities (as defined in the organization's security policies and procedures) (NIST SP 800-53 REV. 4: AT-3 and AT-4; FY 2022 CIO FISMA Metrics: 2.15)?
 - 46.1. Please provide the assessed maturity level for the agency's Protect Security Training program.

Managed and Measurable (Level 4)

46.2. Please provide the assessed maturity level for the agency's Protect function.

Managed and Measurable (Level 4)

46.3. Provide any additional information on the effectiveness (positive or negative) of the organization's Security Training program that was not noted in the questions above. Taking into consideration the maturity level generated from the questions above and based on all testing performed, is the security training program effective?

Function 3: Detect - ISCM

- To what extent does the organization utilize information security continuous monitoring (ISCM) policies and an ISCM strategy that addresses ISCM requirements and activities at each organizational tier? (NIST SP 800-53, Rev. 5: CA-7, PM-6, PM-14, and PM-31; NIST SP 800-37 (Rev. 2) Task P-7; NIST SP 800-137: Sections 3.1 and 3.6; CIS Top 18 Security Controls v.8: Control 13)

 Managed and Measurable (Level 4)
- 48. To what extent have ISCM stakeholders and their roles, responsibilities, levels of authority, and dependencies been defined and communicated across the organization (NIST SP 800-53 REV. 4: CA-1; NIST SP 800-137; CSF: DE.DP-1; NIST 800-37, Rev. 2 Task P-7 and S-5)
- 49. How mature are the organization's processes for performing ongoing information system assessments, granting system authorizations, including developing and maintaining system security plans, and monitoring system security controls? (OMB A-130; NIST SP 800-137: Section 2.2; NIST SP 800-53, Rev. 5: CA-2, CA-5, CA-6, CA-7, PL-2, and PM-10; NIST Supplemental Guidance on Ongoing Authorization; NIST SP 800-37 (Rev. 2) Task S-5; NIST SP 800-18, Rev. 1, NIST IR 8011; OMB M-14-03; OMB M-19-03)

Managed and Measurable (Level 4)

- 50. How mature is the organization's process for collecting and analyzing ISCM performance measures and reporting findings (NIST SP 800-137)?
 - 51.1. Please provide the assessed maturity level for the agency's Detect ISCM domain/function.

Managed and Measurable (Level 4)

51.2. Provide any additional information on the effectiveness (positive or negative) of the organization's ISCM program that was not noted in the questions above. Taking into consideration the maturity level generated from the questions above and based on all testing performed, is the ISCM program effective?

Function 4: Respond - Incident Response

- To what extent does the organization utilize an incident response plan to provide a formal, focused, and coordinated approach to responding to incidents (NIST SP 800-53 REV. 4: IR-8; NIST SP 800-61 Rev. 2, section 2.3.2; CSF, RS.RP-1, Presidential Policy Directive (PPD) 8 National Preparedness)?
- To what extent have incident response team structures/models, stakeholders, and their roles, responsibilities, levels of authority, and dependencies been defined and communicated across the organization (NIST SP 800-53 REV. 4: IR-7; NIST SP 800-83; NIST SP 800-61 Rev. 2; CSF, RS.CO-1, OMB M-20-04; FY 2022 CIO FISMA Metrics: Section 4; CSF: RS.CO-1; and US-CERT Federal Incident Notification Guidelines)?
- How mature are the organization's processes for incident detection and analysis? (EO 14028, Section 6; OMB M-22-05, Section I;

Function 4: Respond - Incident Response

CISA Cybersecurity Incident and Vulnerability Response Playbooks; FY 2022 CIO FISMA Metrics: 10.6; NIST 800-53, Rev. 5: IR-4, IR-5, and IR-6; NIST SP 800-61 Rev. 2; OMB M20-04; CSF: DE.AE-1, DE.AE-2 -5, PR.DS-6, RS.AN-1 and 4, and PR.DS-8; and CIS Top 18 Security Controls v.8: Control 17)

Consistently Implemented (Level 3)

Comments: None of the metrics at the managed and measurable level were provided during the assessment.

How mature are the organization's processes for incident handling? (EO 14028, Section 6; OMB M-22-05, Section I; CISA Cybersecurity Incident and Vulnerability Response Playbooks; FY 2022 CIO FISMA Metrics: 10.6; NIST 800-53, Rev. 5: IR-4; NIST SP 800-61, Rev. 2; CSF: RS.MI-1 and 2)

Consistently Implemented (Level 3)

Comments: None of the metrics at the managed and measurable level were provided during the assessment.

- To what extent does the organization ensure that incident response information is shared with individuals with significant security responsibilities and reported to external stakeholders in a timely manner (FISMA; OMB M-20-04; NIST SP 800-53 REV. 4: IR-6; US-CERT Incident Notification Guidelines; PPD-41; CSF: RS.CO-2 through 5; DHS Cyber Incident Reporting Unified Message)
- To what extent does the organization collaborate with stakeholders to ensure on-site, technical assistance/surge capabilities can be leveraged for quickly responding to incidents, including through contracts/agreements, as appropriate, for incident response support (NIST SP 800-86; NIST SP 800-53 REV. 4: IR-4; OMB M-20-04; PPD-41).
- To what extent does the organization utilize the following technology to support its incident response program? Web application protections, such as web application firewalls Event and incident management, such as intrusion detection and prevention tools, and incident tracking and reporting tools Aggregation and analysis, such as security information and event management (SIEM) products Malware detection, such as antivirus and antispam software technologies Information management, such as data loss prevention File integrity and endpoint and server security tools (NIST SP 800-137; NIST SP 800-61, Rev. 2; NIST SP 800-44)
 - 59.1. Please provide the assessed maturity level for the agency's Respond Incident Response domain/function.

 Consistently Implemented (Level 3)
 - 59.2. Provide any additional information on the effectiveness (positive or negative) of the organization's Incident Response program that was not noted in the questions above. Taking into consideration the maturity level generated from the questions above and based on all testing performed, is the incident response program effective?

Function 5: Recover - Contingency Planning

60. To what extent have roles and responsibilities of stakeholders involved in information systems contingency planning been defined and communicated across the organization, including appropriate delegations of authority (NIST SP 800-53 REV. 4: CP-1, CP-2,

Function 5: Recover - Contingency Planning

and CP-3; NIST SP 800-34; NIST SP 800-84; FCD-1: Annex B)?

To what extent does the organization ensure that the results of business impact analyses (BIA) are used to guide contingency planning efforts? (FY 2022 CIO FISMA Metrics: 10.1.4; NIST SP 800-53, Rev. 5: CP-2, and RA-9; NIST SP 800-34, Rev. 1, 3.2; NIST IR 8286; FIPS 199; FCD-1; OMB M-19-03; CSF:ID.RA-4)

Consistently Implemented (Level 3)

Comments: None of the metrics at the managed and measurable level were provided during the assessment.

- To what extent does the organization ensure that information system contingency plans are developed, maintained, and integrated with other continuity plans (NIST SP 800-53 REV. 4: CP-2; NIST SP 800-34; FY 2022 CIO FISMA Metrics: 5.1; OMB M-19-03; CSF: PR.IP-9)?
- To what extent does the organization perform tests/exercises of its information system contingency planning processes? (FY 2022 CIO FISMA Metrics: 10.1; NIST SP 800-34; NIST SP 800-53, Rev. 5: CP-3 and CP-4; CSF: ID.SC-5 and CSF: PR.IP10; CIS Top 18 Security Controls v.8: Control 11)

Consistently Implemented (Level 3)

Comments: None of the metrics at the managed and measurable level were provided during the assessment.

- To what extent does the organization perform information system backup and storage, including use of alternate storage and processing sites, as appropriate (NIST SP 800-53 REV. 4: CP-6, CP-7, CP-8, and CP-9; NIST SP 800-34: 3.4.1, 3.4.2, 3.4.3; FCD-1; NIST CSF: PR.IP-4; FY 2022 CIO FISMA Metrics, Section 5; and NARA guidance on information systems security records)?
- To what level does the organization ensure that information on the planning and performance of recovery activities is communicated to internal stakeholders and executive management teams and used to make risk based decisions (CSF: RC.CO-3; NIST SP 800-53 REV. 4: CP-2 and IR-4)?
 - 66.1. Please provide the assessed maturity level for the agency's Recover Contingency Planning domain/function.

 Consistently Implemented (Level 3)
 - 66.2. Provide any additional information on the effectiveness (positive or negative) of the organization's Contingency Planning program that was not noted in the questions above. Taking into consideration the maturity level generated from the questions above and based on all testing performed, is the contingency program effective?

A.1. Please provide the assessed maturity level for the agency's Overall status.

Summary

Cycle	Maturity Level	Mean	Mode
FY22 Core Metrics	Managed and Measurable (Level 4)	3.61	Managed and Measurable (Level 4)
FY22 Supplementary Metrics			
FY22 Overall	Managed and Measurable (Level 4)	3.61	Managed and Measurable (Level 4)

Overall

Function	Calculated Maturity Level	Mean	Mode	Assessed Maturity Level	Explanation
Function 1: Identify - Risk Management / Supply Chain Risk Management	Managed and Measurable (Level 4)	3.67	Managed and Measurable (Level 4)	Defined (Level 2)	The FLRA has a Supply Chain Strategic Plan and is working towards deploying procedures in the coming year.
Function 2: Protect - Configuration Management / Identity & Access Management / Data Protection & Privacy / Security Training	Managed and Measurable (Level 4)	3.59	Managed and Measurable (Level 4)	Managed and Measurable (Level 4)	
Function 3: Detect - ISCM	Managed and Measurable (Level 4)	4.00	Managed and Measurable (Level 4)	Managed and Measurable (Level 4)	
Function 4: Respond - Incident Response	Consistently Implemented (Level 3)	3.33	Consistently Implemented (Level 3)	Consistently Implemented (Level 3)	
Function 5: Recover - Contingency Planning	Consistently Implemented (Level 3)	3.33	Consistently Implemented (Level 3)	Consistently Implemented (Level 3)	
Function 0: Overall	Effective	3.61	Managed and Measurable (Level 4)	Effective	

Function 4: Respond - Incident Response

Function	Count
Ad Hoc (Level 1)	0
Defined (Level 2)	0
Consistently Implemented (Level 3)	0
Managed and Measurable (Level 4)	0
Optimized (Level 5)	0
Ad Hoc (Level 1)	0
Defined (Level 2)	0
Consistently Implemented (Level 3)	0
Managed and Measurable (Level 4)	0
Optimized (Level 5)	0
Ad Hoc (Level 1)	0
Defined (Level 2)	0
Consistently Implemented (Level 3)	0
Managed and Measurable (Level 4)	0
Optimized (Level 5)	0
Ad Hoc (Level 1)	0

Defined (Level 2)	0
Consistently Implemented (Level 3)	0
Managed and Measurable (Level 4)	0
Optimized (Level 5)	0
Ad Hoc (Level 1)	0
Defined (Level 2)	0
Consistently Implemented (Level 3)	0
Managed and Measurable (Level 4)	0
Optimized (Level 5)	0
Ad Hoc (Level 1)	0
Defined (Level 2)	0
Consistently Implemented (Level 3)	0
Managed and Measurable (Level 4)	0
Optimized (Level 5)	0
Ad Hoc (Level 1)	0
Defined (Level 2)	0
Consistently Implemented (Level 3)	0
Managed and Measurable (Level 4)	0
Optimized (Level 5)	0
Ad Hoc (Level 1)	0

Defined (Level 2)	0
Consistently Implemented (Level 3)	0
Managed and Measurable (Level 4)	0
Optimized (Level 5)	0
Ad Hoc (Level 1)	0
Defined (Level 2)	0
Consistently Implemented (Level 3)	0
Managed and Measurable (Level 4)	0
Optimized (Level 5)	0

Appendix 3 Report Distribution

Federal Labor Relations Authority

Colleen Duffy Kiko, Member Susan Tsui Grundmann, Member Michael Jeffries, Executive Director Dave Fontaine, Chief Information Officer Noah Peters, Solicitor

CONTACTING THE OFFICE OF INSPECTOR GENERAL

IF YOU BELIEVE AN ACTIVITY IS WASTEFUL, FRAUDULENT, OR ABUSIVE OF FEDERAL FUNDS, CONTACT THE:

HOTLINE (800)331-3572

HTTP://WWW.FLRA.GOV/OIG-HOTLINE

EMAIL: OIGMAIL@FLRA.GOV

CALL: (202)218-7970 FAX: (202)343-1072

WRITE TO: 1400 K Street, N.W. Suite 250, Washington,

D.C. 20424

The complainant may remain confidential; allow their name to be used; or anonymous. If the complainant chooses to remain anonymous, FLRA OIG cannot obtain additional information on the allegation, and also cannot inform the complainant as to what action FLRA OIG has taken on the complaint. Confidential status allows further communication between FLRA OIG and the complainant after the original complaint is received. The identity of complainants is protected under the provisions of the Whistleblower Protection Act of 1989 and the Inspector General Act of 1978. To learn more about the FLRA OIG, visit our Website at http://www.flra.gov/oig



Office of Inspector General

FISMA EVALUATION