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(U) Results in Brief

(U) August 29, 2016

(U) Objective
(U//FOUO) We determined whether the National Security Agency (NSA) effectively implemented its privileged access-related Secure-the-Net (STN) initiatives. This report is one in a series in response to a congressional request in the classified annex to the Intelligence Authorization Act of FY 2016. This act requires the DoD Inspector General to assess whether NSA remedied the vulnerabilities exploited by a security breach and completed all STN initiatives.

(U) Finding
(U//FOUO) NSA officials effectively implemented or partially implemented four of the seven privileged access-related STN initiatives included in our audit:

- develop and document a plan for a new system administration model;
- assess the number of system administrators across the enterprise;
- implement two-person access controls over data centers and machine rooms; and
- implement two-stage authentication controls for system administration.

(U//REL TO USA, FOUO) However, NSA did not have guidance concerning key management and did not consistently secure server racks and other sensitive equipment in the data centers and machine rooms in accordance with the initiative requirements and policies, and did not extend two-stage authentication controls to all high-risk users.

(U//REL TO USA, FOUO) In addition, NSA officials did not effectively implement three privileged access-related STN initiatives:

- fully implement technology to oversee privileged user activities;
- effectively reduce the number of privileged access users; and
- effectively reduce the number of authorized data transfer agents.

(U) Background
(U//REL TO USA, FOUO) After the security breach, NSA began developing and implementing 40 STN initiatives. The STN initiatives focused on insider threats to NSA systems, data, and infrastructure. For this audit, we focused on 7 of the 40 STN initiatives that we determined presented the highest risk to NSA’s ability to secure network access, protect against insider threats, and provide increased oversight of personnel with privileged access.

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1. (U) A level of access that is significantly greater than users performing normal operations.
2. (U) Between August 2012 and May 2013, an NSA contractor in Hawaii exfiltrated about 1.5 million classified and sensitive documents from NSA systems.

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3. (U) System administrators have privileged access to maintain, configure, and operate computer systems.
(U) Results in Brief


(U) Findings (cont'd)

(U//REL TO USA, FOOU) NSA did not effectively implement the three STN initiatives because it did not develop an STN strategy that detailed a structured framework and methodology to implement the initiatives and measure completeness. As a result, NSA's actions to implement STN did not fully meet the intent of decreasing the risk of insider threats to NSA operations and the ability of insiders to exfiltrate data.

(U) Recommendations (cont'd)

(U//FOUO) NSA/CSS (6/16), 50 U.S.C. secs. 3565 (P.L. 106-34, sec. 6), (b)(1)

(U//FOUO) NSA/CSS (6/16), 50 U.S.C. secs. 3565 (P.L. 106-34, sec. 6), (b)(1)

(U) Management Comments and Our Response

(U//REL TO USA, FOOU) The Director, Technology Directorate, NSA/Central Security Service Chief Information Officer, agreed with all recommendations. However, the comments did not fully address all specifics of the recommendations. The Director did not include all system and network administrators in his strategy to expand two-stage authentication controls and did not implement capabilities to provide technology-based monitoring across the entire privileged access community. In addition, the Director did not identify specific actions NSA would take to ensure approvers used consistent processes to grant privileged access or data transfer authority. Therefore, we request that the Director, Technology Directorate, NSA/Central Security Service Chief Information Officer, provide additional documentation and comments on this final report by September 27, 2016. Please see the Recommendations Table on the back of this page.

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(U) **Recommendations Table**

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(U) Please provide Management Comments by September 27, 2016.
(U) MEMORANDUM FOR DIRECTOR, TECHNOLOGY DIRECTORATE, NATIONAL SECURITY AGENCY / CENTRAL SECURITY SERVICE CHIEF INFORMATION OFFICER

[Report No. DODIG-2016-129]

(S//REL TO USA, EVN) We are providing this report for review and comment. We conducted this audit in response to a congressional requirement. NSA effectively implemented or partially implemented four of the seven privileged access-related Secure-the-Net initiatives included in our audit. However, NSA did not effectively implement the other three initiatives. Consequently, NSA did not fully meet the intent of decreasing the risk of insider threats to its operations and the ability of insiders to exfiltrate data.

(U) We considered management comments on a draft of this report. DoD Instruction 7650.03 requires that recommendations be resolved promptly. Comments from the Director, Technology Directorate, NSA/Central Security Service Chief Information Officer, partially addressed Recommendations 2.a, 2.b, and 3.a. Therefore, we request that the Director, Technology Directorate, NSA/Central Security Service Chief Information Officer, provide additional comments on those recommendations by September 27, 2016.

(U) Please provide comments that conform to the requirements of DoD Instruction 7650.03. Classified comments must be sent electronically over the Secret Internet Protocol Router Network. Please send a PDF file containing your comments to [redacted] and [redacted]. Copies of your comments must have the actual signature of the authorizing official for your organization. We cannot accept the /Signed/ symbol in place of the actual signature. Comments provided on the final report must be marked and portion-marked, as appropriate, in accordance with DoD Manual 5200.01.

(U) We appreciate the courtesies extended to the staff. Please direct questions to me at 703-699-7331 (DSN 329-7331).

Carol N. Gorman
Assistant Inspector General
Readiness and Cyber Operations
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Bates 000607
(U) Introduction

(U) Objective

(U) Our audit objective was to determine whether the National Security Agency (NSA) Secure-the-Net (STN) initiatives were effectively implemented to improve security controls over NSA’s data, systems, and personnel activities. This report is one in a series on the implementation of NSA’s STN initiatives and focuses on the controls to limit privileged access (PRIVAC)⁴ to NSA systems and data, and to monitor privileged user actions for unauthorized or inappropriate activity. Please see Appendix A for scope and methodology and prior audit coverage related to the objective.

(U) The classified annex to the Intelligence Authorization Act for FY 2016 requires the DoD Office of Inspector General (OIG) to assess whether NSA remedied the vulnerabilities exploited by a security breach and completed all STN initiatives.⁵

(U) Background

(U) NSA Mission and Infrastructure

(C/REL TO USA, FVEY) NSA/Central Security Service (CSS) leads U.S. Government cryptology⁶ operations focused on signals intelligence and information assurance products and services, and enables computer network operations to gain a decision making advantage for the United States and its allies. NSA uses advanced information technology to store, process, and protect its activities and information. NSA’s enterprise

⁴ (U) NSA/CSS Policy Instruction 6-0001, “NSA/CSS Privileged Access,” January 20, 2016, defines PRIVAC as a higher level of access than the access needed to perform normal processes and system operations.

⁵ (U) The congressional request was included in the classified annex to H.R. 134-144 to accompany H.R. 2596. H.R. 2596 was incorporated into H.R. 4127, the final version of the Intelligence Authorization Act for FY 2016. H.R. 4127 was included in P.L. 114-113, “Consolidated Appropriations Act, 2016,” December 18, 2015.

⁶ (U) Cryptology is the art and science of making and breaking codes and ciphers. NSA/CSS is responsible for creating the systems that protect U.S. communications and for analyzing systems and communications used by foreign powers.
(U) STN Initiatives

NSA was evaluating its security posture when the unauthorized disclosures of classified data in June 2013\(^7\) prompted it to implement additional processes and security measures to protect its infrastructure, systems, and data against insider threats. Specifically, in June 2013, NSA began developing and implementing 40 STN initiatives\(^8\) to improve controls over NSA computer systems and data, and increase oversight of its personnel. NSA’s approach to implement the STN campaign was based on the size and complexity of their infrastructure and organization, and focused primarily on increasing layered protection to reduce the risk of insider threats. See Appendix B for a list and description of the 40 STN initiatives. The Director, NSA, requested completion of all STN initiatives by June 2015.\(^9\) In June 2015, NSA reported to the Senate Select Committee on Intelligence and the House Permanent Select Committee on Intelligence that it had completed 34 of the 40 STN initiatives.

For this audit, we focused on 7 of the 40 STN initiatives that we determined presented a higher risk to NSA’s ability to secure network access, protect against insider threats, and provide increased oversight of personnel with PRIVAC to NSANet, network devices, and infrastructure. Those seven initiatives are as follows:

- (U/) develop and document a new system administration model (initiative 22 in Appendix B),
- (U/) assess the number of system administrators (SAs)\(^10\) across the enterprise (initiative 34),

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\(^7\) (C/REL-TO-USA, EYES) Between August 2012 and May 2013, an NSA contractor in Hawaii exfiltrated about 1.5 million classified and sensitive documents from NSA systems through various techniques.

\(^8\) (U/) The number of STN initiatives changed over time; however, as of June 2015, NSA reported 40 STN Initiatives to the House Permanent Select Committee on Intelligence.

\(^9\) (U/) In September 2014, the NSA Chief Information Officer updated the Director, NSA on the status of completing the STN initiatives. Although NSA officials stated that the Director approved an extension for completing eight of the STN initiatives, the documentation provided did not support that decision.

\(^10\) (U) SAs have PRIVAC to maintain, configure, and operate computer systems.
(U) Finding

- (U//FOUO) Implement two-person access (TPA) control over data centers and machine rooms[^11] (DCMs) (Initiative 21),

- (U//FOUO) Implement two-stage authentication (TSA) control for system administration (Initiative 4),[^12]

- (U//FOUO) Reduce the number of personnel with PRIVAC (Initiative 35),

- (U//FOUO) Reduce the number of authorized data transfer agents (DTAs) (Initiative 33),[^13] and

- (U//FOUO) Oversee privileged user activities (Initiative 36).

(U) We nonstatistically selected the following four NSA installations to include in our audit:

- (U//FOUO) NSA Washington serves as NSA headquarters and is located in the Northeast region.

- (U//FOUO) NSA Texas is one of the four NSA cryptologic centers.

- (U//FOUO) NSA Utah Data Center is a comprehensive national cybersecurity intelligence data center located in the West region.

- (U//FOUO) North Carolina State University Laboratory for Analytic Sciences primarily supports research and development, and is located in the Southeast region.

[^11]: (U//FOUO) DCMs are facilities that host computing systems, servers, data storage, and machine rooms.
[^12]: (U//FOUO) NSA/SS 0113; 50 USC sec. 3005 (P.L. 106-33, sec. 6)
[^13]: (U//FOUO) DTAs are designated personnel approved by an authorizing official to use removable media to transfer data to or from an NSA/SS information system.
[^14]: (U//FOUO) The four cryptologic centers are located in Texas, Georgia, Hawaii, and Colorado.
(U) NSA Responsibilities for Implementing STN Initiatives

STN is an ongoing campaign requiring involvement from all NSA directorates; however, the NSA Technology Directorate is the primary lead for implementing the initiatives. The Directorate, led by the Chief Information Officer, protects worldwide NSA/CSS information, personnel, activities, and facilities through its internal counterintelligence programs. The NSA Associate Director for Security and Counterintelligence appoints security personnel to provide guidance and assist NSA personnel in making security-related decisions.

(U) Review of Internal Controls

DoD Instruction 5010.40 requires DoD organizations to implement a comprehensive system of internal controls that provides reasonable assurance that programs are operating as intended and to evaluate the effectiveness of the controls. We identified internal control weaknesses related to the initiatives we reviewed. Specifically, NSA did not develop a strategy and a detailed implementation plan that clearly described the process for implementing and measuring progress toward completing the STN initiatives. Additionally, NSA did not consistently secure server racks and other sensitive equipment inside the DCMs and did not implement an

We will provide a copy of the report to the senior official responsible for internal controls at NSA.

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15 (U) NSA is planning to restructure its organization beginning on or around August 1, 2016. The NSA nomenclatures and directorate references used in this report are based on its structure as of July 2016.

(U) Finding

(U//FOUO) NSA Did Not Fully Complete and Effectively Implement All PRIVAC-Related Initiatives

(U//FOUO) NSA officials effectively implemented or partially implemented four of the seven PRIVAC-related STN initiatives included in our audit:

- develop and document a plan for a new system administration model;
- assess the number of all SAs across the enterprise;
- implement TPA controls over DCMs; and
- implement TSA controls for system administration.

(C//REL TO USA, FOUO) However, NSA did not have guidance concerning key management and did not consistently secure server racks and other sensitive equipment in the DCMs in accordance with requirements and policies, and did not extend two-stage authentication controls to all high-risk users.

(C//REL TO USA, FOUO) In addition, NSA officials did not effectively implement three PRIVAC-related STN initiatives:

- fully implement technology to oversee privileged user activities;
- effectively reduce the number of privileged users; and
- effectively reduce the number of authorized DTAs.

(C//REL TO USA, FOUO) NSA did not effectively implement the three initiatives because it did not develop an STN strategy that detailed a structured framework and methodology to implement the initiatives and measure completeness. As a result, NSA's actions to implement STN did not fully meet the intent of decreasing the risk of insider threats to NSA operations and the ability of insiders to exfiltrate data.
(U) NSA Effectively Implemented Two and Made Progress in Completing Two PRIVAC-Related Initiatives

(U//FOUO) NSA effectively implemented two and partially implemented two of the seven STN initiatives included in our audit. Specifically, NSA developed and implemented a new system administration model, and assessed the number of SAs across the enterprise and removed PRIVAC from users who did not require elevated levels of access. In addition, NSA partially implemented TPA controls over DCMs and TSA controls for SAs, but will not meet the full intent of the ongoing initiatives without taking additional actions.

(U//FOUO) NSA Developed a New System Administration Model

(U//FOUO) NSA developed the NSA/CSS Enterprise Administration Model for system administration (initiative 22) and implemented NSA/CSS Policy Instruction 6-000117 to increase oversight of privileged users and define levels of PRIVAC. NSA documentation identified that it completed the initiative to develop a tiered-system administration model to limit PRIVAC based on assigned tasks in December 2014. To assess NSA's actions taken to complete the initiative, we reviewed the system administration model and verified it contained tiered levels of access and defined different types of privileged users. We also reviewed and verified the accompanying policy that defined each level of access and the overall PRIVAC process.

17 (U) NSA/CSS Policy Instruction 6-0001, "NSA/CSS Privileged Access," January 20, 2016, defines privileged access, implements procedures, and assigns responsibilities for PRIVAC to NSA/CSS information systems.
In December 2014, NSA established a tiered-pyramid system administration model that identified users as either tier 1, tier 2, tier 3, or tier 4. The new system administration model categorized users based on the following levels of access:

- **(U) Tier 3 (SYS3):**
- **(U) Tier 2 (SYS2):**
- **(U) Tier 1 (SYS1):**
- **(U) Tier 0 (SYS0):**

**(U) NSA Assessed the Number of SAs and Removed PRIVAC for Users Who Did Not Require It**

NSA assessed the number of SAs across the enterprise and removed PRIVAC based on the tiered model (initiative 34). NSA documentation identified it completed the initiative to identify the number of SAs across the enterprise and remove PRIVAC from users who did not require elevated levels of access to perform assigned duties in August 2013. To assess NSA's actions taken to complete the initiative, we met with NSA officials to determine actions taken to identify privileged users immediately following the June 2013 security breach, and reviewed the system administration model and

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18 (U) Public key infrastructure supports digital signature and other security mechanisms for DoD functional enterprise programs.
We also observed the process for requesting and approving PRIVACY Act requests. NSA identified and categorized privileged users who performed SA functions in three distinct tiers in accordance with Office of the Director of National Intelligence requirements.
(U//FOUO) NSA Partially Implemented TPA Controls Over DCMs

(U//FOUO) NSA made progress in implementing TPA controls over DCMs (initiative 21), but may not meet the full intent of the initiative without taking additional actions.

- NSA/SS (b)(2), 50 USC sec. 3107 (P.L. 88-30, sec. 6)
- NSA/SS (b)(1), 50 USC sec. 3101 (P.L. 88-30, sec. 6)
- NSA/SS (b)(3), 50 USC sec. 3103 (P.L. 88-30, sec. 6)
- NSA/SS (b)(4), 50 USC sec. 3104 (P.L. 88-30, sec. 6)
- NSA/SS (b)(5), 50 USC sec. 3105 (P.L. 88-30, sec. 6)

(U//FOUO) To assess NSA’s actions taken to complete the initiative at the four sites visited, we reviewed NSA policies and site standard operating procedures, interviewed DCM managers and other personnel, conducted walkthroughs of the DCMs, conducted tests to and reviewed logs. Furthermore, we attempted to access server racks...

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(U) NSA Updated Procedures to Access DCMs

(U) Consistent Processes to Authorize Access to DCMs Were Followed

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24 (U) NSA-controlled sites are locations where NSA is the host. Non-NSA-controlled sites are locations where NSA is the tenant.

25 (U) We visited three NSA-controlled sites (NSA Washington, NSA Texas, and the Utah Data Center) and one non-NSA-controlled site (North Carolina State University Laboratory of Analytic Sciences).
At NSA Texas, the Utah Data Center, and North Carolina State University
Laboratory of Analytic Sciences, we observed unlocked server racks and sensitive
equipment.
(S//NF) NSA also was not providing sufficient oversight of personnel and equipment inside DCMs.

Not locking server and equipment racks and

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(C//REL TO USA, FVEY) NSA Partially Implemented TSA Controls

(C//REL TO USA, FVEY) NSA made progress in implementing TSA controls for its highest risk administrators, but may not meet the full extent of the initiative (initiative 4) without taking additional actions. NSA began implementing the

(C//REL TO USA, FVEY) To assess NSA’s actions taken to complete the initiative, we reviewed policies and procedures for monitoring and auditing privileged user activities.

We also tested whether TSA controls prevented personnel from accessing systems, devices, or networks not previously approved.

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* 50 USC sec. 3006 (P.L. 86-36, sec. 6)
(C//REL TO USA, FVEY) TSA Controls Were Not Fully Implemented for High-Risk Administrators

(C//REL TO USA, FVEY) NSA did not fully implement TSA controls for its highest risk administrators. NSA officials stated that they did not follow a formal process or define specific parameters to assess which SYS2 users to include in their initial deployment of the additional authentication requirements.

additional actions are needed to ensure all high risk administrators are required to use TSA controls. Table 1

(U) Table 1

(C//REL TO USA, FVEY) NSA officials stated that they did not follow a formal process or define specific parameters to assess which SYS2 users to include in their initial deployment of the additional authentication requirements.
(C//REL TO USA, FVEY) NSA Did Not Implement TSA Controls for All System and Network Administrators

(C//REL TO USA, FVEY) NSA did not implement TSA controls for all its system and network administrators.

[U] Table 2.

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(U//FDEG) NSA Did Not Effectively Implement
Three PRIVAC-Related Initiatives

(U//REL TO USA, FDEG) NSA did not effectively implement three PRIVAC-related
initiatives. Specifically, NSA did not effectively implement technology to provide
oversight of all privileged user activities, and did not reduce the number of users with
PRIVAC and data transfer authority.

(U//FDEG) NSA Did Not Effectively Implement Technology to
Monitor PRIVAC Activities

(U//REL TO USA, FDEG) NSA did not fully implement technology-based capabilities to
oversee the activities of privileged users (initiative 36). To assess
NSA's actions taken to complete the initiative, we reviewed the system administration
model and verified it contained tiered levels of access and defined different types of
privileged users.
(S//REL TO USA, FVEY) NSA did not implement technology-based capabilities to monitor privileged users.
(U//FOUO) NSA Did Not Reduce the Number of Privileged Users

(U//FOUO) NSA took steps to identify, but not to reduce, the number of privileged users across its enterprise (initiative 35). NSA documentation identified that it completed the initiative to reduce the number of privileged users from 2013. Although repeatedly requested, NSA officials could not provide supporting documentation that showed the number of privileged users before and after the purge or the actual number of users purged. Therefore, to assess NSA's actions taken to complete the initiative, we requested prior reports or spreadsheets supporting the number of privileged users and interviewed NSA officials to identify the process they followed for establishing a baseline. We used e-mails that included statistics for specific points in time beginning in March 2014 to validate the number of privileged users.

(U//FOUO) Before implementing the initiative, the NSA did not know how many users had PRIVAC across the enterprise. In June 2013, shortly after the security breach, NSA reported to the Office of the Director of National Intelligence that it had 1,500 privileged users. NSA officials stated that they used a manually kept spreadsheet, which they no longer had, to identify the initial number of privileged users. In addition to not being able to support the number of privileged users reported to the Office of the Director of National Intelligence, NSA did not support its preliminary baseline of 1,500 privileged users or its goal for reducing privileged users to 1,400. The NSA DCIO stated that NSA arbitrarily removed PRIVAC from 200 users and required those users to submit e-mail requests to the NSA Associate Directorate for Security and Counterintelligence and the CIO's office to re-obtain PRIVAC between July 2013 and September 2013. The NSA DCIO stated that NSA considered the individual e-mails and justification before reauthorizing PRIVAC for any user.

(U//FOUO) NSA took a zero-based approach to remove PRIVAC from the users and required them to re-enroll using 200. However, NSA did not use a zero-based approach for the remaining privileged users. Several NSA privileged users we interviewed confirmed that NSA removed their PRIVAC and required them to

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* EO 13526, sec. 1.4(a), 1.4(g)(6), 60 USC sec. 3920 (F.L. 80-96, sec 6)
(C/REL TO USA, FVEY) submit a justification in support to re-obtain PRIVAC. Although the actions taken by NSA established a baseline of the number of personnel with PRIVAC, NSA should have used the baseline as its starting point to reduce privileged users instead of using the baseline to report a reduction in privileged users. Figure 1 shows a timeline of NSA’s actions between June 2013 and May 2016 to identify privileged users as well as a continued and consistent increase in the number of privileged users once the enrollment process began.

(U) Figure 1. Timeline of NSA Actions to Identify and Reduce Privileged Users

(U) Source: DoD OIG

(U//FOUO) NSA Did Not Reduce the Number of DTAs

(C/REL TO USA, FVEY) NSA did not reduce the number of DTAs (Initiative 33). NSA documentation identified that it completed the initiative to reduce the number of DTAs in March 2014. Although repeatedly requested, NSA officials could not provide supporting documentation for the total number of DTAs before and after the purge or the actual number of users purged. Therefore, to assess NSA’s actions taken to complete the initiative, we requested prior reports or spreadsheets supporting the number of DTAs and interviewed NSA officials to identify the process they followed for establishing a baseline. To validate the number of DTAs, we reviewed e-mails that included statistics for specific points in time to identify the number of DTA requests and approvals because NSA could not generate a report covering previous periods.
Before the STN campaign, NSA did not know how many DTAs it had because the manually kept list was corrupted during the months leading up to the security breach. After the STN campaign began, NSA officials estimated that they had about 8 personnel with DTA privileges across the enterprise; they also acknowledged the number was unsubstantiated. In January 2014, NSA took a zero-based approach to identify the actual number of authorized DTAs across the enterprise by requiring all users to submit a request for DTA privileges. NSA officials stated that they received DTA requests between January 2014 and March 2014. Rather than using that number as a baseline, NSA officials determined that the DTA requests represented a reduction from their original unsupported estimate and, therefore, they considered the initiative completed.

The NSA DCIO stated that although the initiative focused on reducing the number of DTA, the actions taken by NSA were not designed to reduce the number of DTAs; rather, they were taken to overhaul the DTA process to identify and vet all DTAs through. Contrary to the initiative’s intent, NSA continued to consistently increase the number of DTAs throughout the next 12 months. Table 3 identifies the starting point after conducting the initial baseline and the steady increase of approved DTAs after the zero-based approach.

**Table 3. Number of Approved DTAs Since March 2014**

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<thead>
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<th>Date</th>
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<tr>
<td>March 2014</td>
<td></td>
</tr>
<tr>
<td>September 2014</td>
<td></td>
</tr>
<tr>
<td>March 2015</td>
<td></td>
</tr>
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*(U) Number represents a cumulative total as of a point in time.
(U//FOUO) NSA Lacked a Comprehensive Strategy to Effectively Implement PRIVAC-Related STN Initiatives

(S//NI) NSA did not effectively implement three PRIVAC-related STN initiatives because it lacked a comprehensive strategy and implementation plan. Specifically, NSA did not develop a detailed, structured methodology to implement and measure the completion of the initiatives before it took action to complete them. NSA identified STN initiatives and activities it considered sufficient to implement each initiative through working groups and other ad hoc processes, but these discussions were not documented. When the initiatives were developed, NSA officials also did not address necessary actions to effectively measure completeness. The NSA DCIO consistently stated that NSA was more concerned with taking an action than assessing specific risks and developing a plan to mitigate them. Although NSA eventually assessed the risks to its operating environment in April 2016, this assessment was completed after the STN initiatives were being implemented. Consequently, NSA officials lacked a framework for implementing TPA and TSA controls and technology-based monitoring for all privileged users, and for reducing the number of privileged users and DTAs needed to support mission requirements.

39(F/G//FOUO) A user can have DTA general and privileged access simultaneously and, therefore, could be double-counted.
NSA did not keep accurate and detailed documentation that identified its methodology for completing each initiative and did not describe how it measured the initiatives' completeness and effectiveness. Instead, NSA developed internal reports that had only limited information about the actions taken to complete the initiatives. NSA officials stated that, in some instances, they developed the internal reports after reporting the initiative as complete. NSA's unstructured approach to implement the initiatives resulted in reporting the initiatives as complete when only partial progress had been made or the intent of the initiative had not been fully met. While NSA acted to complete the initiatives, the lack of a comprehensive strategy hindered its ability to determine whether the actions were sufficient to effectively reduce the risk of insider threats.

Although NSA has begun to implement its broader Secure-the-Enterprise campaign, it has yet to effectively complete all the STN initiatives. Therefore, the Director, Technology Directorate, NSA/CSS Chief Information Officer, should develop a strategy with milestones and metrics to expand TSA controls and implement automated, technology-based monitoring for all system and network administrators; develop and implement procedures to ensure approvers use consistent processes to grant privileged access or data transfer authority based on mission needs; and, periodically assess and reconcile the number of privileged users and DTAs needed to support NSA mission requirements.

Insider Threat Risks Remain Despite Implementing PRIVAC-Related STN Initiatives

NSA's actions to implement PRIVAC-related STN initiatives did not fully decrease the risk of insider threats or the ability of insiders to exfiltrate data. The STN campaign was established in response to the June 2013 security breach in which an NSA contractor exfiltrated about 1.5 million sensitive and classified documents. NSA designed the STN initiatives to reduce the vulnerabilities exploited during this breach.
NSA did not align its resources and ensure that the actions taken were sufficient to fully implement the intent of the initiatives and reduce the vulnerabilities it identified. NSA also did not have a defined strategy or an implementation plan to monitor completion of the initiatives. As a result, NSA did not complete all the initiatives by June 2015 as required by the Director, NSA, and some initiatives that NSA considered fully completed were only partially completed.

NSA is still at risk of personnel with nefarious intentions exploiting vulnerabilities and again compromising highly classified national security information.

(U) Management Comments on the Finding and Our Response

(U) Management Comments on NSA’s Approach to Completing STN Initiatives

(C//REL TO USA EYES) The Director, Technology Directorate, NSA/CSS Chief Information Officer, requested that we consider rewording the following sentence on page 22 of the report: “The NSA DCIO consistently stated that NSA was more concerned with taking an action than assessing specific risks and developing a plan to mitigate them.” The Director requested that we revise the sentence using the words “tactical steps,” “sense of urgency,” or “reactionary,” and stated that NSA took a tactical and reactionary approach to implementing the STN initiatives instead of planning and strategizing how to implement the initiatives because of the urgency of limiting the risk of insider threats after the June 2013 security breach.
The Director also stated that NSA officials provided e-mail documentation showing that the Director and Deputy Director, NSA, supported moving forward with only two of the remaining initiatives. The Director stated that completing the remaining STN initiatives by June 2015 was not feasible.

(U) Our Response

We agree that NSA took a tactical and reactionary approach to limit the risk of insider threats when implementing STN initiatives based on the circumstances surrounding the security breach. Although NSA worked in a fluid situation, NSA should have developed a strategy that detailed a structured framework and methodology for implementing STN to ensure its actions were effective and mitigated vulnerabilities exploited during the security breach. Therefore, we did not revise the report.

We acknowledge that NSA provided documentation regarding the Director’s approval to move forward with two STN initiatives.

(U) Management Comments on Reducing Insider Threat Risks

The Director, Technology Directorate, NSA/CSS Chief Information Officer, requested that we consider rewording a paragraph in the report section titled “Insider Threat Risks Remain Despite Implementing PRIVAC-Related STN Initiatives.” The Director stated that the paragraph was misleading because it implied that insider threat...
(U) Our Response

(S//NF) We agree that insider threat risks cannot all be eliminated, and that reduced some of the insider threat risks. However, as stated in the report, NSA did not effectively implement or complete three of the seven initiatives included in the audit scope. We believe NSA could have taken additional actions to further mitigate insider threat risks, therefore, we did not revise the report.

(U) Recommendations, Management Comments, and Our Response

(U) Recommendation 1

(U) We recommend that the Director, Technology Directorate, National Security Agency/Central Security Service Chief Information Officer, in coordination with the Director, Associate Directorate for Security and Counterintelligence:

a. (S//REL TO USA, FVEY)

(U) NSA Comments

(S//REL TO USA, FVEY) The Director, Technology Directorate, NSA/CSS Chief Information Officer, agreed.
(U) Our Response

(U) Comments from the Director, Technology Directorate, NSA/CSS Chief Information Officer, addressed all specifics of the recommendation, and no further comments are required.

(U) NSA Comments

(U) Our Response

(U) Comments from the Director, Technology Directorate, NSA/CSS Chief Information Officer, addressed the specifics of the recommendation, and no further comments are required.
(U) **Recommendation 2**

(U) We recommend that the Director, Technology Directorate, National Security Agency/Central Security Service Chief Information Officer, develop a strategy that includes milestones and metrics to:

a. **(C//REL TO USA, FVEY)**

(U) **NSA Comments**

(C//REL TO USA, FVEY) The Director, Technology Directorate, NSA/CSS Chief Information Officer, agreed.

(U) **Our Response**

(C//REL TO USA, FVEY) Comments from the Director, Technology Directorate, NSA/CSS Chief Information Officer, partially addressed the recommendation. Although

Therefore, we request that the Director reconsider his position and provide additional comments on the final report.
(U) NSA Comments

The Director, Technology Directorate, NSA/CSS Chief Information Officer, agreed.

(U) Our Response

Comments from the Director, Technology Directorate, NSA/CSS Chief Information Officer, partially addressed the recommendation. Therefore, we request that the Director provide additional comments and documentation on the final report that identify the specific...
Therefore, we request that the Director reconsider his position and provide additional comments on the final report describing how NSA plans to meet the intent of the recommendation.

(U) Recommendation 3

(U) We recommend that the Director, Technology Directorate, National Security Agency/Central Security Service Chief Information Officer, in coordination with system owners:

a. (U/TOPOL) NSA/CSS (8object), 50 USC sec. 3065 (P.L. 86-36, sec. 63, (b)(1))

(U) NSA Comments

(U/TOPOL) The Director, Technology Directorate, NSA/CSS Chief Information Officer, agreed with the recommendation.

(U) Our Response

(U/TOPOL) Although the Director, Technology Directorate NSA/CSS Chief Information Officer, agreed, he did not address all specifics of the recommendation. Therefore, we request that the Director provide additional comments on the final report that identify specific actions NSA will take.

b. (U/TOPOL) NSA/CSS (8object), 50 USC sec. 3065 (P.L. 86-36, sec. 63, (b)(1))

(U) NSA Comments

(U/TOPOL) The Director, Technology Directorate, NSA/CSS Chief Information Officer, agreed,
(U) Our Response

(U) Comments from the Director, Technology Directorate, NSA/CSS Chief Information Officer, addressed all specifics of the recommendation, and no further comments are required.

c. (U//FOUO) 50 U.S.C. sec. 3043 (P.L. 96-51, sec. 6), (b)(3)

(U) NSA Comments

(U//FOUO) The Director, Technology Directorate, NSA/CSS Chief Information Officer, agreed,

(U) Our Response

(U) Comments from the Director, Technology Directorate, NSA/CSS Chief Information Officer, addressed all specifics of the recommendation, and no further comments are required.
(U) Appendix A

(U) Scope and Methodology

(U) We conducted this performance audit from January 2016 through July 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

(U//FOUO) We initiated this audit in response to a congressional request included in the classified annex to the Intelligence Authorization Act for FY 2016, which requires the DoD OIG to assess whether NSA remedied the vulnerabilities exploited by the June 2013 security breach and completed all STN initiatives. We focused on 7 of the 40 STN initiatives that we determined presented a higher risk to NSA’s ability to secure network access, protect against insider threats, and provide increased oversight of personnel with PRIVAC.

(C//REL TO USA, FLENS) We met with officials at NSA headquarters from the Technology Directorate, the Associate Directorate for Security and Counterintelligence Center, and other directorates responsible for developing, monitoring, implementing, and overseeing completion of PRIVAC-related STN initiatives.

(U//FOUO) We nonstatistically selected and visited four NSA installations located in Washington D.C., Texas, Utah, and North Carolina. We conducted walkthroughs of the DCMs. We met with officials responsible for security operations.
(U/FOUO) nonstatistically selected and interviewed privileged users about their

(U) Table 4. Privileged Users Interviewed

(U) Use of Computer-Processed Data

(U/FOUO) We used computer-processed data to identify and validate privileged users based on assigned responsibilities. We determined that (a) data were
(U) Use of Technical Assistance

(U) The DoD OIG Quantitative Methods Division assisted in selecting a nonstatistical sample of privileged users we used in selecting users to interview at the sites visited.

(U) Prior Coverage

(U) During the last 5 years, the NSA Inspector General issued one classified report related to NSA’s ability to implement STN campaign initiatives.

(U) NSA Inspector General

(U) STN Initiatives

 NSA completed or is in the process of implementing 40 STN initiatives in response to the June 2013 security breach. NSA categorized the initiatives in three major areas: tighten controls on computer systems, tighten controls on data, and increase oversight of its personnel. The table below describes the STN initiatives.

<table>
<thead>
<tr>
<th>STN Initiative</th>
<th>Initiative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>4. Implement TSA Control for System Administration Policies</td>
<td>NSA/CSS, 801(1), EO 13526, sec. 1.4(d), 1-4(d); 801(1), 50 USC sec. 3002 (P.L. 86-36, sec. 6)</td>
</tr>
<tr>
<td>STN Initiative</td>
<td>Initiative Description</td>
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<tr>
<td>----------------</td>
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</tbody>
</table>

(U) Appendixes
<table>
<thead>
<tr>
<th>STN Initiative</th>
<th>Initiative Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>21. Implement TPA Control</td>
<td>SSA/CSS: 4(b)(1), EO 13326, sec. 1.4(e), 1.4(g), (b)(3), 50 USC sec 5095 (P.L. 86-36, sec. 6)</td>
</tr>
<tr>
<td>Over DCMs</td>
<td></td>
</tr>
<tr>
<td>22. Develop and Document a New System Administration Model</td>
<td></td>
</tr>
<tr>
<td>SSA/CSS: 4(b)(1), EO 13326, sec. 1.4(e), 1.4(g), (b)(3), 50 USC sec 5095 (P.L. 86-36, sec. 6)</td>
<td></td>
</tr>
<tr>
<td>33. Reduce the Number of Authorized DTAs</td>
<td></td>
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</tbody>
</table>
### STN Initiative

<table>
<thead>
<tr>
<th>Initiative Description</th>
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</thead>
<tbody>
<tr>
<td>34. Assess the Number of SAs Across the Enterprise</td>
</tr>
<tr>
<td>35. Reduce the Number of Personnel With PRIVAC</td>
</tr>
<tr>
<td>36. Oversight of Privileged User Activities</td>
</tr>
</tbody>
</table>
MEMORANDUM FOR DEPARTMENT OF DEFENSE INSPECTOR GENERAL—INFORMATION MEMORANDUM

SUBJECT: (U/FOCO) NSA Response to Discussion Draft for DoD IG Project No. D2010-D005-0072.000

(U/FOCO) NSA welcomes the observations and opportunities for improvement offered by the DoD IG to benefit our continuing effort to mitigate insider threat across the enterprise. While the Media Leak events that led to Secure the Net (STN) were both unforeseen and serious, we consider the extensive progress we made in a short time to be a “good news” story. We are very proud of the improvements to our security posture we have been able to achieve, all while sustaining and advancing our vital mission, across our vastly complex network, NSANet. That, coupled with the fact that NSA’s mission requirements shift daily as a result of world events, creates an extremely dynamic environment that must balance mission needs with security requirements.

(U/FOCO) All of these Information Technology (IT) components and the knowledgeable people to administer the systems must flex to meet the changing mission needs and interoperate successfully, constantly re-prioritizing decisions to impact IT services that must be delivered 24/7. In addition, policy changes resulting from 9/11 (such as “need to share” versus “need to know” and CDTI’s launch of an IC-wide IT environment, IC ITE) have completely changed, in scope and method, how IT must work to support its customers. NSA hears the IC’s need of technical work to adapt its IT systems to effect the needed changes to successfully operate—and operate securely—across the IC.

(U/FOCO) We recognize that there are no silver bullets in information or network security — no tactic or plan that can wholly eliminate the potential for harm by myriad threats. By employing a layered defense approach rather than relying on a single initiative to protect our networks, systems, and data, we have been able to significantly reduce the risks inherent in the operation of a global, dynamic enterprise. Further, the combination of initiatives we have implemented and are continuing to develop ensure that the activities of a nefarious actor...
(U) We appreciate the time, energy, and commitment of the audit team, as they worked to understand the measures and capabilities we have implemented over the last three years. We hope they came to appreciate the depth and breadth of the enterprise we are defending, and the complexities inherent in that defense.
(U) National Security Agency (cont'd)

(U) NSA respectfully offers the following related to the three recommendations.

(U) Response to Recommendations

(U) Recommendation 1

[Redacted]

[Redacted]

[Redacted]
(U) National Security Agency (cont'd)

(U) Recommendation 2

We recommend that the Director, Technology Directorate, National Security Agency / Central Security Service Chief Information Technology Officer develop a strategy that includes milestones and metrics to:

(a) NSA/CSS, (b)(1), EO 13356, sec. 1(4)(c), 1(8)(d), 8(1)(f), 50 USC sec. 3023 (PL 89-56, sec. 63 (8)(f))

(b) NSA/CSS, (b)(1), EO 13356, sec. 4(9), 1(12), 8(1)(f), 50 USC sec. 3023 (PL 89-56, sec. 63 (8)(f))

NSA Response: NSA concurs with the DoD IG's recommendation. The

NSA/CSS, (b)(1), EO 13356, sec. 1(4)(c), 1(8)(d), 8(1)(f), 50 USC sec. 3023 (PL 89-56, sec. 63 (8)(f))

(b) NSA/CSS, (b)(1), EO 13356, sec. 1(4)(c), 1(8)(d), 8(1)(f), 50 USC sec. 3023 (PL 89-56, sec. 63 (8)(f))

NSA Response: NSA concurs with the DoD IG's recommendation and
believes it has satisfied this recommendation.

NSA/CSS, (b)(1), EO 13356, sec. 1(4)(c), 1(8)(d), 8(1)(f), 50 USC sec. 3023 (PL 89-56, sec. 63 (8)(f))
(U) National Security Agency (cont’d)

(U) Recommendation 8

(U//FOUO) We recommend that the Director, Technology Directorate, National Security Agency/ Central Security Service Chief Information Officer, in coordination with system owners:

a. NSA/CSS (04), 50 USC Sec. 3045 (PL 96-50, Sec. (b)(3))

(U//FOUO) NSA Response: NSA concurs with the DoD IG’s recommendation.

b. NSA/CSS (04), 50 USC Sec. 3045 (PL 96-50, Sec. (b)(3))

(U//FOUO) NSA Response: NSA concurs with the DoD IG’s recommendation and

NSA/CSS (04), 50 USC Sec. 3045 (PL 96-50, Sec. (b)(3))

c. NSA/CSS (04), 50 USC Sec. 3045 (PL 96-50, Sec. (b)(3))

(U//FOUO) NSA Response: NSA concurs with the DoD IG’s recommendation and

NSA/CSS (04), 50 USC Sec. 3045 (PL 96-50, Sec. (b)(3))

(U) Thank you for the opportunity to review and comment on the draft audit report.

NSA/CSS (04)

GREGORY L. SMITHBERGER
NSA/CSS Chief Information Officer

cc:
(U//FOUO) DoD IG Discussion Draft – Project No. D2016-D009RC-0072-000
Comment Matrix
(U) Glossary

(U) **Data Center and Machine Room.** Facilities that host computing systems, servers, data storage, and machine rooms.

(U) **Data Center Manager.** Personnel with responsibility for overseeing and managing DCM activities and operations.

(U) **Data Transfer Agent (DTA).** Designated personnel approved to use removable media to transfer data to or from an information system.

(U) **Data Transfer Agent (DTA) General.** Personnel who have a primary responsibility to move data within the enterprise using removable media.

(U) **Data Transfer Agent (DTA) Privileged.** Personnel who use removable media to perform PRIVAC functions.

(U) **Limited Administrator.** Users who perform PRIVAC functions on standalone systems.

(C//REL TO USA, EVEN) **Network Administrators.** Administrative users who maintain computer infrastructure with emphasis on networks.
(U) Privileged Access. A level of access that is significantly greater than that of users performing normal operations.

(U) Public Key Infrastructure. An enterprise-wide service supporting digital signatures and other public key-based security mechanisms for DoD functional enterprise programs.

(U) Tier 3 System Administrators (SYS3). Administrative users who have privileged access to maintain, configure, and operate computer systems.

(U) Tier 2 System Administrators (SYS2). Provide an overview of system security requirements for a specific system and describe implemented security controls to meet the requirements.
(U) Glossary

(U/FOUO) Two Person Access (TPA). Requires two authorized personnel.

(U/FOUO) Two Stage Authentication (TSA). Requires administrators to use at least two separate sources of authentication.
(U) Source of Classified Information

Source 1: (U) Permanent Select Committee on Intelligence, "Intelligence Authorization Act for Fiscal Year 2016:" (Document classified SECRET//NOFORN)
Declassification Date: January 1, 2040
Generated Date: October 5, 2015

Source 2: (U) NSA-provided Secure-the-Net Activity Update, November 16, 2016:
(Document classified SECRET//NOFORN)
Declassification Date: September 1, 2039
Generated Date: November 16, 2015

Source 3: (U) NSA Associate Directorate for Security and Counterintelligence,
"Snowden Investigative Overview:" (Document classified SECRET//REL TO USA, FVEY)
Declassification Date: March 1, 2041
Generated Date: February 9, 2016

Source 4: (U) NSA-provided Securing the Net, May 2015: (Document classified CONFIDENTIAL//REL TO USA, FVEY)
Declassification Date: May 1, 2040
Generated Date: May 2015

Source 5: (U) NSA Commander Intent for "Securing the Enterprise is the Path Forward:" (Document classified CONFIDENTIAL//REL TO USA, FVEY)
Declassification Date: September 30, 2038
Generated Date: September 8, 2015

Source 6: (U) NSA Town Hall Briefing, "Secure the Enterprise:" (Document classified SECRET//REL TO USA, FVEY)
Declassification Date: November 1, 2040
Generated Date: November 12, 2015

Source 7: (U) NSA Secure the Network Detailed Report, January 2016: (Document classified CONFIDENTIAL//REL TO USA, FVEY)
Declassification Date: January 28, 2041
Generated Date: January 28, 2016
(U) Source of Classified Information

**Source 8:** (U) NSA List of Privileged Users: (Document classified CONFIDENTIAL//REL TO USA, FVEY)
Declassification Date: August 1, 2038
Generated Date: January 28, 2016

**Source 9:** (U) NSA-Texas List of Privileged Users (Document classified CONFIDENTIAL//REL TO USA, FVEY)
Declassification Date: February 1, 2041
Generated Date: February 16, 2016

**Source 10:** (U) NSA-Washington List of Privileged Users (Document classified CONFIDENTIAL//REL TO USA, FVEY)
Declassification Date: February 1, 2041
Generated Date: February 23, 2016

**Source 11:**

**Source 12:**
(U) Acronyms and Abbreviations

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>CSS</td>
<td>Central Security Service</td>
</tr>
<tr>
<td>DCM</td>
<td>Data Center and Machine Room</td>
</tr>
<tr>
<td>DCIO</td>
<td>Deputy Chief Information Officer</td>
</tr>
<tr>
<td>DTA</td>
<td>Data Transfer Agent</td>
</tr>
<tr>
<td>NSA</td>
<td>National Security Agency</td>
</tr>
<tr>
<td>NSANet</td>
<td>NSA Network</td>
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<tr>
<td>PRIVAC</td>
<td>Privileged Access</td>
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<td>SA</td>
<td>System Administrator</td>
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<td>STN</td>
<td>Secure-the-Net</td>
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<tr>
<td>TPA</td>
<td>Two-Person Access</td>
</tr>
<tr>
<td>TSA</td>
<td>Two-Stage Authentication</td>
</tr>
</tbody>
</table>

NSA/SS: 42 U.S.C. 10166 (P.L. 85-35, sec. 3)
NSANet: 50 U.S.C. 3460 (P.L. 86-36, sec. 5)
Whistleblower Protection
U.S. Department of Defense

The Whistleblower Protection Enhancement Act of 2012 requires the Inspector General to designate a Whistleblower Protection Ombudsman to educate agency employees about prohibitions on retaliation, and rights and remedies against retaliation for protected disclosures. The designated ombudsman is the DoD Hotline Director. For more information on your rights and remedies against retaliation, visit www.dodig.mil/programs/whistleblower.

For more information about DoD IG reports or activities, please contact us:

Congressional Liaison
congressional@dodig.mil; 703.604.8324

Media Contact
public.affairs@dodig.mil; 703.604.8324

Monthly Update
dodigconnect-request@listserv.com

Reports Mailing List
dodig_report@listserv.com

Twitter
twitter.com/DoD_IG

DoD Hotline
dodig.mil/hotline