



October 9, 2019

The Honorable Adam S. Boehler
Chief Executive Officer
U.S. International Development Finance Corporation
1100 New York Ave NW,
Washington, DC 20527

Dear Mr. Boehler:

Serving as the head of the U.S. International Development Finance Corporation (DFC), a new federal entity with a critical mission, presents an important opportunity to set the foundation for future success. As the Inspector General with oversight responsibility of the entities that will be consolidated to form DFC—the Overseas Private Investment Corporation (OPIC) and elements of the U.S. Agency for International Development (USAID), including the Office of Development Credit Authority (DCA)—our office is in a unique position to provide insight and to bring your attention to critical issues during this process.¹ With this aim in mind, we have identified several key considerations for you in managing the transition and standup of DFC.

Key Transition Considerations

The formal proposal to establish DFC emerged in response to the Office of Management and Budget's (OMB) April 2017 call for inputs into a comprehensive plan for reforming the federal government. In response to this 2017 OMB memo, we developed [reform plan guidance](#) highlighting key considerations for USAID in the reform process that built off of observations from our past investigative and audit work. Many of these considerations are relevant to DFC as it progresses through the transition process. The accumulation of our past audit and investigative work pertaining to DFC's constituent elements, annual [top management challenges](#), and my recent [testimony](#) also reflect similar factors for DFC leadership attention. In particular, these point to a need for continuing leadership focus on (1) interagency coordination, (2) performance management and evaluation, (3) workforce management, and (4)

¹ In March 2019, the President submitted [a reorganization plan](#) to Congress calling for OPIC and USAID's DCA to be transferred to DFC. USAID's existing legacy credit portfolio under the Urban Environment Program, along with any other direct loan programs and non-DCA guaranty programs, was also to be transferred under the reorganization plan.

internal controls around core management systems. These areas are also covered in the Better Utilization of Investments Leading to Development (BUILD) Act of 2018, which established DFC.

Maximizing Interagency Coordination to Drive Development Impact. Coordination across institutional lines is key for any federal entity's success, especially one that is being constituted from multiple pre-existing entities. However, our work has raised questions about OPIC's ability to effectively manage such coordination in the past. We found, for example, that OPIC did not have a process for considering how its projects aligned with U.S. foreign policy goals, or a formal mechanism to pursue opportunities for interagency collaboration. It did not proactively seek project collaboration opportunities with other U.S. agencies or donors, nor did it have clear guidelines for doing so.²

While the July 2019 DFC [coordination report](#) outlines institutional and programmatic linkages between USAID and DFC, our work has highlighted significant continuing challenges in carrying out foreign assistance operations that involve multiple U.S. Government agencies, including difficulty balancing competing priorities and managing additional layers of review.³

The BUILD Act, [DFC reorganization plan](#), and coordination report indicate several areas where there is a need for strong linkages among the DFC, State Department, USAID, MCC, and other agencies. However, some details remain to be worked out through an interagency process, such as establishment of a new Enterprise Fund and responsibility for the \$21 billion sovereign loan guarantee portfolio in five countries (Iraq, Israel, Jordan, Tunisia, and Ukraine).⁴ Furthermore, questions remain about a position with a key role in the interagency coordination process, that of the Chief Development Officer responsible for ensuring collaboration and development impact as well as managing employees tasked with structuring, monitoring, and evaluating transactions and projects co-designed with USAID. As DFC is stood up and coordination becomes even more critical, it will be important for the Chief Development Officer to be provided sufficient resources, authority, and staff to achieve that objective.

Using Quality Data to Decide How, Where, and When to Invest. We uncovered weaknesses in OPIC's broader performance management framework that could carry forward to DFC if this does not receive special attention. Specifically, OPIC's framework lacked processes for assessing and aligning prospective projects with OPIC's strategic goals, and did not articulate how it defined or measured progress toward its goals. According to staff we spoke with, the process for tracking OPIC's progress toward strategic goals was ad hoc at best. Some interviewees said goals were not tracked at all. This is particularly significant for DFC, as

² USAID OIG, "[OPIC Investments Increased Chile's Energy Capacity, but Weak Processes and Internal Controls Diminish OPIC's Ability To Gauge Project Effects and Risks](#)," February 1, 2019.

³ USAID OIG, "[Fiscal Year 2019 Top Management Challenges](#)," November 2018.

⁴ The Enterprise Fund program authorizes U.S. Government grant money to support market economies. Each Enterprise Fund operates as an independent, 501(c)(3) nonprofit organization with a Board nominated by the President. The sovereign loan guarantee program is a policy tool that allows foreign governments to issue debt guaranteed by the U.S. Government.

the Government Accountability Office's (GAO) guidance on successful mergers underscores the need to develop coherent strategic goals and measure progress toward those goals.⁵

Our work has shown that OPIC lacked the business practices necessary to ensure it captured sufficient data to track progress in carrying out its mission, advancing U.S. foreign policy, or capturing the development impact of its projects. According to OPIC, its priority was increasing commitments, managing its limited resources, and fulfilling its self-sustainment requirement. This emphasis placed insufficient attention on other aspects of mission achievement, such as development.

We have also identified weaknesses in OPIC's approach for measuring the projected development effects of projects—a key consideration for whether or not to finance a project. In many instances OPIC did not require applicants to provide supporting documentation to verify the development impacts of its projects. In other instances, OPIC changed information about projected development impact in borrowers' applications without obtaining support for the changes. Additionally, site visits were limited and OPIC relied on borrowers to self-report information on results. By contrast, best practices noted in OMB's guidance call for agencies to build and rely on a "portfolio of evidence"—quality data to make informed policy decisions and determine whether they are meeting the essential goals of their mission.⁶ Similarly, the BUILD Act calls on DFC to develop a performance measurement system to evaluate and monitor projects and to guide plans for future projects.

Maintaining an Efficient and Effective Workforce to Carry Out DFC's Mission. GAO research on past challenges that have distracted new agencies from their missions during their first year of operation has pointed to delays in obtaining key officials and inadequate staffing as a frequent source of difficulty.⁷ While we are encouraged to see that DFC's plans account for a Chief Risk Officer, dedicated Inspector General, and an independent accountability mechanism, it will be essential that these key positions and functions be filled in a timely fashion. OPIC has had difficulty filling critical positions in the past. For instance, in response to congressional guidance encouraging OPIC to adopt an accountability mechanism, OPIC created the Office of Accountability. However, the office was staffed with only the Director, and the position remained vacant from October 2014 until February 2016.⁸

Despite past challenges, we are encouraged to see that the position of Inspector General was posted publicly on August 29, 2019, to solicit applications. Filling the Inspector General position in an effective and timely way and ensuring that it operates in line with needed authorities and independence will be critical. In March [2017 testimony](#) before the House Committee on Appropriations, Subcommittee on State, Foreign Operations, and Related Programs, I

⁵ GAO, "[Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations](#)," July 2003.

⁶ OMB, "[Comprehensive Plan for Reforming the Federal Government and Reducing the Federal Civilian Workforce](#)," April 12, 2017.

⁷ GAO, "[Implementation: The Missing Link in Planning Reorganizations](#)," March 1981.

⁸ GAO, "[Overseas Private Investment Corporation: Additional Actions Could Improve Monitoring Processes](#)," December 2015.

highlighted the then untenable situation surrounding our oversight of OPIC under annual agreements that were subject to negotiation, limitations, and delays. It will be important that DFC's future Inspector General not be subject to similar arrangements, and that his or her office's roles and relationships with respect to other key functions, such as that of the independent accountability mechanism and Chief Risk Officer, be clearly defined. In particular, DFC's Inspector General must have the full backing of the authorities in the Inspector General Act of 1978, as amended.⁹

In addition to filling key vacancies, we urge DFC to identify staffing requirements needed to responsibly meet its mandate. In 2016, OPIC had 11 staff responsible for clearing prospective projects and monitoring environmental and social risks for all OPIC projects worldwide—a \$21.5 billion portfolio. It appears that as a result of limited staffing, between 2012 and 2016, OPIC conducted site visits for an average of only 5 percent of active projects worldwide.¹⁰ Furthermore, we found OPIC's approach to meeting appropriations requirements placed heavy reliance on one individual in the Office of Legal Affairs, rather than on segregating duties and building in checks and balances.¹¹ Having sufficient staff to perform critical roles such as monitoring and appropriations compliance is essential for DFC's success.

GAO has stressed the importance of establishing an organizational culture as key to a successful merger, and has considered the institution of a cohesive organizational culture as a key factor in evaluating organizational change.¹² Accordingly, as DFC seeks to blend personnel from USAID and OPIC into a single organization, there will be value in working to merge organizational cultures and develop and embed core values into all aspects of the new corporation.

Identifying and Addressing Vulnerabilities and Needed Controls in Core Management Functions. Effective internal controls help ensure that agencies serve as good stewards of government resources, federal programs fulfill their intended purpose, funds are spent effectively, and assets are safeguarded. We found key weaknesses in OPIC's internal control systems, corrective actions for which OPIC had not completed at the time of transition. The importance of such internal controls cannot be overstated, and I raised this issue in my July 11, 2019, [testimony](#) before the House Committee on Appropriations, Subcommittee on State, Foreign Operations, and Related Programs.

Our audit work has found widespread weaknesses in OPIC's internal control system and a lack of attention to process that is concerning. These weaknesses have hindered OPIC's ability to

⁹ The Inspector General Act of 1978, Section 2(3) requires the OIG to keep the head of establishment and the Congress fully and currently informed about problems and the necessity for and progress of corrective action.

¹⁰ USAID OIG, "[OPIC Investments Increased Chile's Energy Capacity, but Weak Processes and Internal Controls Diminish OPIC's Ability To Gauge Project Effects and Risks](#)," February 1, 2019.

¹¹ USAID OIG, "[OPIC Lacks Policy and Procedures To Ensure Compliance with Annual Appropriations Requirements](#)," July 9, 2019.

¹² GAO, "[Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations](#)," July 2003; and GAO, "[Federal Protective Service: DHS Should Take Additional Steps to Evaluate Organizational Placement](#)," January 2019.

ensure that its projects protected human and labor rights and that it mitigated environmental risks. This was exacerbated by poor business practices for updating policies and procedures and managing records. For example, OPIC did not require certain basic documentation—such as reviews of borrower deliverables and third-party monitoring reports—and did not have a system to capture the receipt of project deliverables.

In another audit, we uncovered weaknesses in OPIC internal controls that led to its noncompliance with six of the seven appropriations requirements we tested. For example, OPIC did not submit quarterly financial unobligated balance reports or its annual budgeted operating plan or post these reports on its website, as required. We also found that OPIC did not track or respond to country-specific congressional notification requirements because OPIC officials concluded it did not render “assistance” to foreign countries; however, the Foreign Assistance Act of 1961, as amended, describes OPIC as being engaged in the “conduct of assistance programs.” These findings raise broader concerns about DFC’s ability to meet other legislative requirements if appropriate processes are not established.

With respect to financial management, we conduct Government Management Reform Act (GMRA) audits for four of the five agencies we oversee, but not for OPIC.¹³ OPIC’s financial statement audit was performed annually by an independent auditor that reported to the Board of Directors.¹⁴ Results of the audits were included in OPIC’s Management Report and posted to its [website](#), and could be reviewed by GAO under certain circumstances. According to OPIC, however, GAO has not reviewed the audit results for a number of years. The BUILD Act leaves responsibility for DFC’s financial reporting, the integrity of its financial statements, and compliance with legal and regulatory requirements related to DFC finances with the Audit Committee of DFC’s Board. This is an area with potential for greater engagement with the new Inspector General to promote transparency and accountability, and to ensure followup on any recommendations that are identified through the financial audit process.

The Charge Card Act requires OIG to conduct periodic risk assessments of OPIC’s charge card program to identify and analyze the risks of illegal, improper, or erroneous purchases and payments. For fiscal years 2018 and 2017, we were unable to review data related to cardholders, active cards, and total travel and purchase expenses because the corporation did not extract, download, or maintain copies of real time data as instructed by the charge card service provider. OPIC could not provide related documentation—a significant internal control concern that needs to be addressed. Without the necessary documentation, we could not assess the risk of OPIC’s charge card program and determine whether an audit of the program is warranted.¹⁵

¹³ Aside from OPIC, USAID OIG has oversight responsibility for USAID, Millennium Challenge Corporation, U.S. African Development Foundation, and Inter-American Foundation.

¹⁴ This is consistent with OPIC’s statute, which calls for an independent certified public accountant to perform a financial and compliance audit of the Corporation’s financial statements at least once every 3 years and to report the results to OPIC’s Board and Congress.

¹⁵ In FY 2016, OPIC purchase card transactions were valued at \$687,841, and travel card transactions were valued at \$4,530,215. Because OPIC’s purchases did not exceed the \$10 million threshold for travel card spending which triggers an audit or review, OIG did not conduct one.

Regarding information management, we have issued two audit reports on OPIC's compliance with the Federal Information Security Modernization Act of 2014 (FISMA). While both audits found that OPIC generally complied with FISMA requirements, a subset of selected controls were not fully effective in preserving the confidentiality, integrity, and availability of the corporation's information and information systems. This vulnerability potentially exposed OPIC's information systems to unauthorized access, use, disclosure, disruption, modification, or destruction. Our office reports on the maturity of five functions associated with the Corporation's information security program on a scale of 1 to 5, with a level 5 rating being optimal, according to OMB and the Department of Homeland Security. Overall, OPIC's maturity level is a 4, which represents an effective information security program. However, two functions related to system protection and contingency planning were rated at a level 3, meaning the policies and procedures are consistently implemented, but quantitative and qualitative effectiveness measures are lacking. Without the appropriate attention, weaknesses in OPIC's financial and information management may carry forward to DFC.

Our investigative work illustrates the risks involved in persistent weaknesses in internal control systems. For example, in September 2017, our office found that multiple conspiring individuals were able to successfully defraud OPIC of more than \$1 million by laundering funds through bank accounts in Liberia. The individuals submitted documents with materially fraudulent representations to OPIC, including false financial documents that inflated the value of assets from U.S.-based parent company investors and a fraudulent disbursement request. It is not clear that the OPIC control systems that will carry over to DFC would be able to detect the risks uncovered by our investigations. To that end, as previously mentioned, the Inspector General needs the full backing of the Inspector General Act, and to be staffed appropriately with auditors, analysts, and special agents. Sufficient oversight staff will be crucial to preventing fraud, waste, and abuse.

DFC Oversight

Oversight authority for DFC will be vested in the DFC Inspector General when he or she is appointed.¹⁶ As I stated above, establishing a DFC Office of Inspector General expeditiously and enabling it to operate with the full authorities of the Inspector General Act is essential to DFC's future success. While our office does not have independent oversight authority for DFC, in the event that a DFC Inspector General is not in place when DFC commences operations, we will work with you to ensure that the proper delegations and agreements are in place to enable us to implement the oversight arrangement outlined in the DFC reorganization plan. In particular, we will work with you to ensure that we have the authority and resources to conduct and oversee investigations and statutorily mandated audits of DFC.

As OPIC continues to receive funding and operate, our office will continue to provide it with audit and investigative oversight. We will complete OPIC-related oversight activities in a timely manner and make the results of this work available to DFC where there is a connection to

¹⁶ The BUILD Act of 2018 ([Public Law No. 115-254](#)) enacted in October 2018 establishes DFC and an Inspector General specifically for DFC—a designated federal entity Inspector General for whom appointment and removal authority resides with the Board.

DFC programs, funding, or personnel. Specifically, USAID OIG will complete its mandated audit work on OPIC's Fiscal Year 2019 compliance with FISMA. In addition, our Office of Investigations has four open investigations related to OPIC that we will continue to work.

Also, our office will monitor the progress of outstanding corrective actions in response to past OPIC-related audit recommendations until a DFC Inspector General is in place, at which time we plan to hand over any remaining open recommendations to his or her office for closeout. Currently, 24 recommendations that we originally directed to OPIC remain open. Of these, 10 are resolved but open pending the completion of planned activities, while 14 others remain unresolved (see attachment). As these open recommendations relate to internal control and information management systems and business practices that are likely to have carried over to DFC from OPIC, we anticipate that the full resolution of these remaining recommendations will require specific attention on the part of DFC's executive leadership and its board.

I hope this letter provides a useful roadmap for both you and the new DFC Inspector General. Our office remains committed to providing effective oversight of foreign assistance programs and operations, and to a smooth transition of oversight responsibilities to DFC's Inspector General. From the transmission of this letter, we will continue our engagement to achieve that objective. We plan to meet with the DFC Board, Audit Committee, and brief the DFC Inspector General. In these engagements, we will continue to highlight critical oversight challenges so that the DFC Inspector General is well prepared to conduct his or her work in an effective and timely way. If you would like additional information about our related work or plans, please do not hesitate to contact me at (202) 712-1150.

Sincerely,

for Ann Calvaresi Barr
Inspector General

- cc: The Honorable Mark Green, USAID Administrator
- David Bohigian, OPIC Executive Vice President
- Irving W. Bailey II, Board Member
- Brent J. McIntosh, Under Secretary for International Affairs, U.S. Department of Treasury
- John J. Sullivan, Deputy Secretary of State
- Christopher P. Vincze, Board Member
- The Honorable Wilbur L. Ross, Jr., Secretary of Commerce

Attachment. Status of Open Recommendations¹⁷

Recommendation	Status	Actions
OPIC Lacks Policy and Procedures To Ensure Compliance With Annual Appropriations Requirements (Report #9-OPC-19-005-P, July 9, 2019)		
Develop and implement a policy that documents and formalizes processes and procedures for ensuring compliance with appropriations requirements.	Resolved but open pending completion of planned activities.	The Agency missed its August 1, 2019, target date to close the recommendation and has not provided an update.
Develop and implement a formal system that includes sufficient detail to ensure timely identification, preparation, and submission of deliverables as required by appropriations law and related congressional reports.	Resolved but open pending completion of planned activities.	The Agency missed its August 1, 2019, target date to close the recommendation and has not provided an update.
Based on formal outreach to the House and Senate Committees on Appropriations, internally produce a written determination on the applicability of the following appropriations requirements reviewed in this report, along with any others that require clarification: (1) submission of quarterly financial unobligated balances reports; (2) submission of annual budgeted operating plan; (3) public posting of required reports on the agency website; (4) congressional notification for assistance activities in Pakistan.	Resolved but open pending completion of planned activities.	The Agency missed its August 1, 2019, target date to close the recommendation and has not provided an update.
OPIC Investments Increased Chile's Energy Capacity, but Weak Processes and Internal Controls Diminish OPIC's Ability To Gauge Project Effects and Risks (Report #9-OPC-19-002-P, February 1, 2019)		

¹⁷ Recommendations are open until OIG determines, based on a review of supporting documentation, that the agency has taken sufficient action to address them. Open recommendations can be unresolved or resolved. *Open-unresolved* means (1) the agency has not provided a management decision to OIG, (2) the agency has provided a management decision that does not meet the relevant criteria, (3) OIG disagrees with the management decision because it does not meet the intent of the recommendation or correct the deficiency, or (4) OIG believes the corrective actions taken for final action are not sufficiently responsive to the recommendation. *Open-resolved* means OIG agrees with the agency's plan for corrective action as described in its management decision, but final action has not yet been completed. This term also includes situations where the agency indicates that it completed its final action but has not yet provided any evidence of its completion, or the agency has provided evidence of its completion but OIG has not yet evaluated it. *Closed* recommendations are closed when OIG determines, based on review of supporting documentation, that the agency has taken sufficient action to correct the deficiencies identified in the recommendation, the recommendation is no longer valid, or there is no further utility in keeping the recommendation open. Supporting documentation must demonstrate that agency actions are complete.

Recommendation	Status	Actions
Implement a process and related guidance for verifying and documenting that OPIC is not competing with the private market in a given country.	Open and unresolved.	OPIC plans to take the recommended change into consideration as it creates policies and procedures for DFC.
Revamp the development impact profile process to sufficiently capture and assess projects' projected and actual effects, and report reliable data to Congress. This should include establishing clear criteria, requiring evidence, aligning application questions to obtain data needed, and documenting the process for determining actual effects.	Open and unresolved.	OPIC plans to take the recommended change into consideration as it creates policies and procedures for DFC. Note: We suggested to the agency that revamping the development impact profile process calls for more than developing a successor to OPIC's development impact measurement system and maintaining a publicly accessible database on project information and performance.
Implement a formal process for consulting with USAID on its development impact profile criteria that includes the documentation of the consultations.	Open and unresolved.	OPIC plans to take the recommended change into consideration as it creates policies and procedures for DFC.
Implement a process and related guidance to verify and document how projects seeking approval complement U.S. development assistance objectives. It should include considerations for connecting to the Department of State's integrated country strategies and for complementing the work of other U.S. Government agencies and other donors.	Open and unresolved.	OPIC plans to take the recommended change into consideration as it creates policies and procedures for DFC.
Implement a performance management framework that is in compliance with the Government Performance and Results Modernization Act of 2010 (GPRAMA) and enables OPIC to fully capture its goals and report on progress in achieving its mission.	Open and unresolved.	OPIC plans to take the recommended change into consideration as it creates policies and procedures for DFC. Note: We suggested to the agency that implementing a performance management framework that complies with GPRAMA encompasses more than a performance measurement system.
Implement a process with a sound methodology for validating data provided by borrowers in the self-monitoring questionnaire, and	Open and unresolved.	OPIC plans to take the recommended change into consideration as it creates policies

Recommendation	Status	Actions
strengthen procedures for timely submissions.		<p>and procedures for DFC.</p> <p>Note: Our review of the BUILD Act did not identify any language that would address the need to improve the quality of information provided by borrowers or review of such information by OPIC staff associated with the self-monitoring questionnaire process. The quality of the information gathered through this process and OPIC's capacity to review and follow up with project partners on specific questionnaire responses diminishes the effectiveness of this oversight tool.</p>
Update the Office of Investment Policy's process for identifying and selecting projects for site visits, and for tracking and documenting planned and actual visits, so that it is streamlined and based on reliable data.	Open and unresolved.	OPIC plans to evaluate its monitoring processes in the context of the new and existing programs of OPIC that will be a part of DFC.
Modify the Office of Investment Policy's guidance to include relevant staff members' roles and responsibilities for providing input into independent engineers' scopes of work and documenting reviews of materials related to environmental and social protection.	Open and unresolved.	OPIC plans to evaluate the recommendation as it develops roles and responsibilities for personnel in DFC.
Implement a formal process with defined roles for handling environmental and social concerns that various stakeholders refer to OPIC.	Open and unresolved.	OPIC plans to take the recommended change into consideration as it engages in the process of creating policies and procedures for DFC.
Conduct and document a baseline assessment of all policies and procedures to identify and update outdated material, and implement controls to ensure periodic reviews and updates.	Open and unresolved.	OPIC plans to conduct a baseline policy review as part of transitioning its policies to DFC.
Conduct and document a review of the Office of Investment Policy's guidance to identify any gaps and check for consistency among other offices' related guidance, and update as necessary.	Open and unresolved.	OPIC plans to assist in the development of systems that are appropriate for the needs of DFC.

Recommendation	Status	Actions
Implement a system to track the receipt, review, and certification of all project deliverables, including third-party reports.	Open and unresolved.	OPIC plans to assist in developing an appropriate system for DFC among several information technology needs based on resource availability.
Develop and implement a borrower evaluation system that contains information on performance, including violations, repayment history, compliance, and development impact. Develop a policy requiring this information to be used in the review process for future deals with reoccurring borrowers.	Open and unresolved.	OPIC plans to consider including explicit reference to the recommended changes when recommending policies for DFC.
Formalize a process for capturing and disseminating lessons learned agency wide that acknowledges strengths and weaknesses associated with business practices, and modify relevant policies and procedures accordingly.	Open and unresolved.	OPIC referenced section 1441 of the BUILD Act related to establishing a Risk Committee, and plans to develop appropriate systems for the DFC to fulfill this recommendation.
OPIC Has Generally Implemented Controls in Support of FISMA for Fiscal Year 2018 (Report #A-OPC-19-006-C, January 30, 2019)		
Document and implement a process to update its privacy impact assessments for the Corporation's information systems.	Resolved but open pending completion of planned activities.	OPIC plans to develop and implement a process to ensure that OPIC's PIAs are revalidated at the frequency established in OPIC's Privacy Policy. Target due date: May 31, 2019. Note: Closure request sent from OPIC on May 2, 2019.
Remediate patch and configuration vulnerabilities in the network identified by the Office of Inspector General, as appropriate, and document the results or document acceptance of the risks of those vulnerabilities.	Resolved but open pending completion of planned activities.	OPIC plans to address these weaknesses by completing its current OS modernization project. OPIC will upgrade all Windows 7 workstations to fully-patched and CIS benchmark-compliant Windows 10 workstations. Similarly, OPIC will upgrade its Windows 2008 servers to fully-patched and CIS benchmark-compliant Windows 2016 servers. Target due date: February 28, 2019.
Document and implement a process to verify that patches are applied in a timely manner.	Resolved but open pending completion of planned activities.	OPIC plans to develop and implement a patch strategy and process to ensure that all network assets are patched within 30 days from the date a patch becomes

Recommendation	Status	Actions
		<p>available in compliance with the risk tolerance defined by the agency. Target due date: February 28, 2019.</p> <p>Note: Closure request sent from OPIC on March 19, 2019.</p>
<p>Document and implement a process to verify that (1) the account management system is updated promptly to support the management of information system accounts and (2) inactive accounts are promptly disabled after 30 days in accordance with the Corporation's access control procedures.</p>	<p>Resolved but open pending completion of planned activities.</p>	<p>OPIC plans to review its process to disable inactive accounts and identify improvements or automation to mitigate the risk of inactive accounts older than 30 days. Target due date: March 30, 2019.</p>
<p>Document and implement a process to verify that interconnection security agreements and memorandums of understanding are annually reviewed and, if needed, updated.</p>	<p>Resolved but open pending completion of planned activities.</p>	<p>OPIC plans to review its current interconnection security agreement procedure to identify areas of improvement. Upon review, OPIC will document and implement necessary corrective actions to ensure that agreements are kept current. Target due date: April 30, 2019.</p> <p>Note: Closure request sent from OPIC on March 22, 2019.</p>
<p>Conduct (1) contingency training and (2) a test of the information system contingency plan in accordance with OPIC's policy.</p>	<p>Resolved but open pending completion of planned activities.</p>	<p>OPIC plans to train personnel with relevant CP responsibilities on the updated version. OPIC will also schedule and perform contingency plan tests as required by policy. Target due date: July 30, 2019.</p>
<p>OPIC Implemented Controls in Support of FISMA for Fiscal Year 2017 but Improvements Are Needed (Report #A-OPC-17-007-C, September 28, 2017)</p>		
<p>Remediate network vulnerabilities identified by the Office of Inspector General's contractor, as appropriate, or document acceptance of the risks of those vulnerabilities.</p>	<p>Resolved but open pending completion of planned activities.</p>	<p>OPIC plans to have management remediate identified known vulnerabilities that may adversely impact OPIC systems. For vulnerabilities that management chooses not to remediate, the Chief Information Officer will document OPIC's risk acceptance by May 31, 2018.</p>