



***Office of Audit
for the Millennium Challenge Corporation***

May 4, 2012

Paul S. Malone
Chief Privacy Officer
Millennium Challenge Corporation
1401 H Street, NW
Washington, DC 20005

Dear Mr. Malone:

During our March 2012 privacy audit,¹ we noted one issue in which we wish to communicate additional information for your consideration. As discussed in the report, the audit identified two systems of records that MCC's Office of the Chief Information and Privacy Officer was not aware of:

- MailChimp, which MCC uses to manage mass e-mails, and
- Avue Central, which MCC previously used to collect applications for employment.

Therefore, individuals' privacy may have been violated because MCC had not implemented controls to protect the individuals' personally identifiable information stored in those systems. OIG could not determine why MCC did not identify the above weaknesses. However, MCC officials pointed out that the privacy program was just implemented during the past year and the Chief Privacy Officer had begun to take measures to identify privacy-related activities across the organization.

Nonetheless, as MCC moves forward to fully implement its privacy program, we urge MCC to implement a mechanism to assure the Chief Privacy Officer is aware of and, as needed, involved in all activities across the organization that may have privacy implications. This will help assure that the Chief Privacy Officer is proactive in implementing privacy requirements, rather than reactive.

If you have any questions concerning this letter or would like to discuss its contents, please contact me (202) 216-6965 or Lisa Banks (202) 712-0447.

¹ "Follow-up Audit of the Millennium Challenge Corporation's Implementation of Key Components of a Privacy Program for Its Information Technology Systems" (Audit Report No. M-000-12-002-P, March 30, 2012).

Sincerely,



Mark S. Norman
Acting Deputy Assistant Inspector General
for Audit
Millennium Challenge Corporation

cc: Daniel W. Yohannes, Chief Executive Officer
Chantale Y. Wong, Vice President of Administration and Finance
W. Philip Gordon, Chief Information Security Officer
John C. Mantini, Managing Director for Audits
A. Pat McDonald, Compliance Officer