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NATIONAL RECONNAISSANCE OFFICE 14675 Lee Road Chantilly, VA 20151-1715

23 August 2016



Dear Mr. Greenewald:

This is in response to your request dated 16 June 2016 and received in the National Reconnaissance Office (NRO) on 17 June 2016. Pursuant to the Freedom of Information Act (FOIA), you requested a copy of the final report by the NRO Inspector General, on the investigation entitled: "Office of Inspector General Audit of the National Reconnaissance Office Fiscal Year 2014 Financial Statements Closed 11/24/14."

Your request has been processed in accordance with the FOIA, 5 U.S.C. § 552, as amended. A thorough search of our files and databases located one document totaling thirty two (32) pages responsive to your request. This document is being released to you in part.

Material that is denied is being withheld pursuant to FOIA exemptions:

(b)(1), as properly classified information under Executive Order 13526, Sections 1.4(c) and (e);

(b)(3), which is the basis for withholding information exempt from disclosure by statute. The relevant withholding statute is 10 U.S.C. § 424, which provides (except as required by the President or for information provided to Congress), that no provision of law shall be construed to require the disclosure of the organization or any function of the NRO; the number of persons employed by or assigned or detailed to the NRO; or the name or official title, occupational series, grade, or salary of any such person; and

(b)(5), which applies to information that is predecisional and deliberative in nature.

You have the right to appeal any adverse determination to the NRO Appellate Authority, 14675 Lee Road, Chantilly, VA 20151-1715, within 90 days of the above date. Should you decide to do this, please explain the basis of your appeal. The FOIA also provides that you may seek dispute resolution for any adverse determination through the NRO FOIA Public Liaison and/or through the Office of Government Information Services (OGIS). Please refer to the OGIS public web page at https://ogis.archive.gov/ for additional information. If you have any questions, please call the Requester Service Center at (703) 227-9326 and reference case number F-2016-00090.

Sincerely,

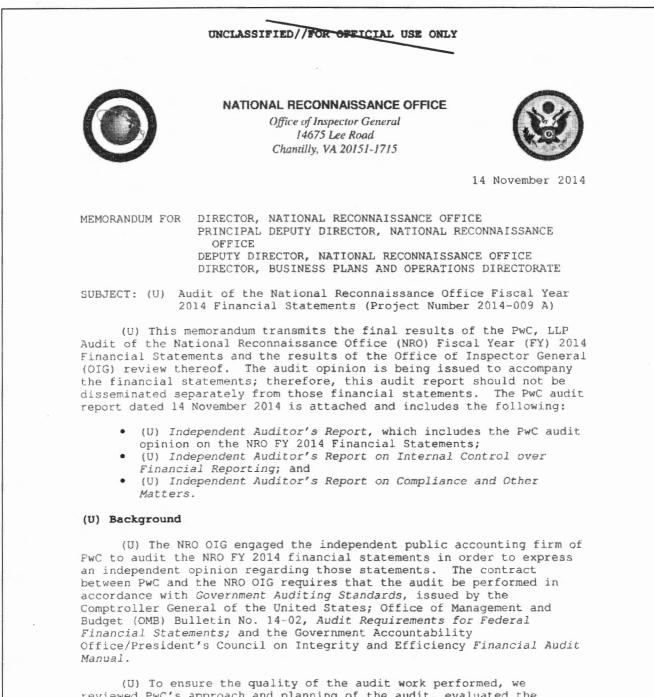
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Patricia B. Cameresi FOIA Public Liaison

Attachment: Audit of the National Reconnaissance Office Fiscal Year 2014 Financial Statements (32 pages)

Approved for Release: 2016/08/15 C05094628

(U) AUDIT REPORT



(0) To ensure the quality of the audit work performed, we reviewed PwC's approach and planning of the audit, evaluated the qualifications and independence of the auditors, monitored the progress of the audit at key points, reviewed and accepted PwC's audit report, and performed other procedures that we deemed necessary. Our review was not intended to enable us to express an opinion on: a) the NRO financial statements, or conclusions about the effectiveness of NRO internal controls; b) whether the NRO's financial management systems substantially complied with the Federal Financial Management

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SUBJECT: (U) Audit of the National Reconnaissance Office Fiscal Year 2014 Financial Statements (Project Number 2014-009 A)

Improvement Act of 1996 (FFMIA); c) or whether the NRO complied with applicable laws and regulations. PwC is responsible for the attached auditor's report dated 14 November 2014 and conclusions expressed in the report. However, our review disclosed no instances where PwC did not comply, in all material respects, with *Government Auditing Standards*.

#### (U) Objectives and Scope

(U) The objectives of the audit were to evaluate (1) the reliability of the data supporting the financial statements; (2) the accuracy of the statements produced; and (3) the adequacy of footnote disclosures in accordance with guidance issued by the Federal Accounting Standards Advisory Board, the OMB, and other authoritative guidance as appropriate. The auditors also reviewed internal controls and compliance with laws and other matters related to the objectives and followed up on prior-year audit findings.

(U//FOUO) Given the sensitivity of NRO's compartmented programs, and to limit the need-to-know, the OIG validated the classification of annex transactions to ensure accurate presentation and disclosure on the financial statements. We provided the results of our testing to PwC for inclusion in the audit results.

#### (U) Audit Results

(U/7FOUQ) PwC issued an **unmodified opinion** on the NRO FY 2014 Financial Statements. An unmodified opinion means that the financial statements present fairly, in all material respects, the financial position and the results of the entity's operations in conformity with generally accepted accounting principles. The auditors also identified two material weaknesses and two significant deficiencies listed below. PwC made detailed recommendations for remediation of the reported findings, which are included in the attached Independent Auditor's Report on Internal Control over Financial Reporting.

- (U//FOUO) Material Weakness Finding #1 The NRO needs to strengthen its controls over Property, Plant and Equipment (PP&E) and the proper classification and recording of contract and transaction by others (TBO) disbursements.
- (U/7F000)—Material Weakness Finding #2 The NRO needs to strengthen processes to develop and monitor execution of accounting policy, guidance and methodologies.
- (U/<del>/TOUS).</del> Significant Deficiency Finding #3 The NRO needs to strengthen system access and monitoring controls.
- (U/7F000) Significant Deficiency Finding #4 Improvements are needed in the documentation and implementation of segregation of duties within the NRO's financial system environments.

(U) The NRO management concurred with all findings and recommendations. The full text of management comments, including plans for implementation of recommendations, is included in the Agency Financial Report.

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Unless noted, redactions on this page are (b)(3) 10 USC section 424

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SUBJECT: (U) Audit of the National Reconnaissance Office Fiscal Year 2014 Financial Statements (Project Number 2014-009 A)

#### (U) OIG Comments on Internal Control Deficiencies

(U//FOUQ) In FY 2014, NRO leadership demonstrated their commitment to improve the control environment at the NRO. Through new policies, procedures, and system enhancements, the NRO took measured steps of improvement. However, implementation of new policies and procedures takes time to obtain the desired outcome. Therefore, it is important to note that the audit results are a reflection of the control environment that existed prior to the implementation of new policies and procedures. As a result, we caution that management must be realistic when gauging the results of the FY 2014 audit.

(U77F0U01 This year PwC identified in audit adjustments, down from last year, which is a substantial decrease. Although the results indicate improvements in terms of dollars, the number of errors did slightly increase. In addition, the current NRO financial environment necessitates a tremendous reliance on manual journal vouchers (JVs) and poses a significant risk to the organization. In FY 2014, the NRO created and posted 1,293 JVs (17,677 lines of accounting) with a gross value of While PwC did not identify any material errors, the JV process is intensive to create, review, and maintain those entries. Overall, the NRO needs to continue improving and automating internal controls throughout the organization to reduce the risk of material errors.

(U) If you have any questions, please contact me at (nonsequre) or at

(nonsecure).

Adam G. Harris

Inspector General

Attachments: 1.(U) Independent Auditor's Report (U) 2.(U) Independent Auditor's Report on Internal Control over Financial Reporting (S//NOFORN) 3.(U) Independent Auditor's Report on Compliance and Other Matters (S//NOFORN)

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#### **Independent Auditor's Report**

(U) To the Director of the National Reconnaissance Office and the Inspector General for the National Reconnaissance Office:

#### (U) Report on the Financial Statements

(U) We have audited the accompanying financial statements of the National Reconnaissance Office (NRO) which comprise the balance sheets as of September 30, 2014 and 2013, and the related statements of net cost and changes in net position, and the combined statements of budgetary resources, and the related notes to the financial statements for years then ended, which collectively comprise NRO's financial statements.

#### (U) Management's Responsibility for the Financial Statements

(U) Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

#### (U) Auditor's Responsibility

(U) Our responsibility is to express an opinion on the financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America, the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, and Office of Management and Budget (OMB) Bulletin No. 14-02, *Audit Requirements for Federal Financial Statements*. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

(U) An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on our judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, we consider internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

PricewaterhouseCoopers LLP, 1800 Tysons Boulevard, McLean, VA 22102-4261 T: (703) 918 3000, F: (703)918 3100, www.pwc.com/us

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Report of Independent Auditors Page 2 of 3

#### (U) Opinion

(U) In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of the NRO as of September 30, 2014 and 2013, and its net cost and changes in net position and budgetary resources for the years then ended, in accordance with accounting principles generally accepted in the United States of America.

#### (U) Other Matters

#### (U) Required Supplementary Information

(U) Accounting principles generally accepted in the United States of America require that the accompanying Management's Discussion and Analysis (MD&A); Required Supplementary Information (RSI); and, Required Supplementary Stewardship Information (RSSI) be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Federal Accounting Standards Advisory Board and OMB Circular A-136, Financial Reporting Requirements, who considers it to be an essential part of financial reporting for placing the basic financial statements in the appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information and the required supplementary stewardship information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we have obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

#### (U) Other Information

(U) Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole. The *Table of Contents*; *Introduction; Message from the Director; A Message from the Chief Financial Officer; Other Information;* and, *Appendices* are presented for purposes of additional analysis and are not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. Such information has not been subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we do not express an opinion or provide any assurance on the information.

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#### (U) Other Reporting Required by Government Auditing Standards

(U) In accordance with *Government Auditing Standards*, we have also issued our report dated November 14, 2014, on our consideration of the NRO's internal control over financial reporting and our report dated November 14, 2014, on its compliance and other matters for the year ended September 30, 2014. The purpose of those reports is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. Those reports are an integral part of an audit performed in accordance with *Government Auditing Standards* in considering NRO's internal control over financial reporting and compliance.

PRICEWATERhars Coppers LLP

McLean, VA November 14, 2014

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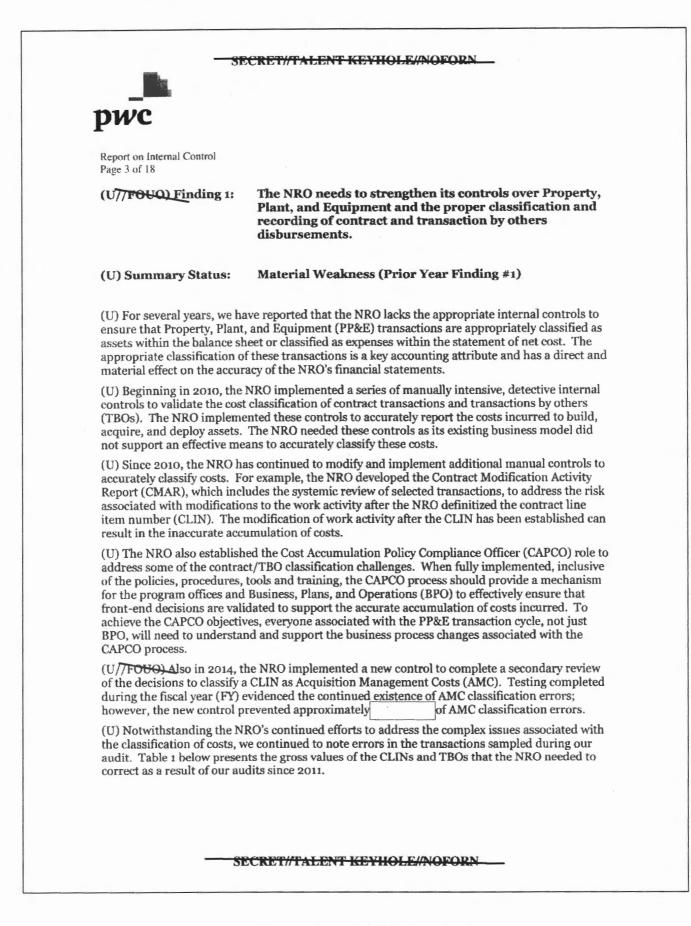


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or a combination of deficiencies in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

(U) Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. However, in the remainder of this report, we identified certain deficiencies in internal control that we consider to be material weaknesses and significant deficiencies. These deficiencies are noted on the following pages.

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FY 2011	FY 2012	FY 2013	FY 2014
Audit Adjustments	Audit Adjustments	Audit Adjustments	Audit Adjustments
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(07/FOUO) The FY 201 total costs associated wi majority of these errors	th 119 errors in the class	presented in ification of work activity	n Table 1 represent the
(PO) to validate the items related to the remaining items. Th typically limited to a information needed available to the AST, the Engineering Cha Memorandums for t reviewed these addit	accuracy of the CLIN cla NRO's major satellite an ne AST/PO's review of the review of the Statement to assess the accuracy of /PO to validate the accur inge Proposals (ECPs), P he Record (MFRs) and/ tional documents, in add	t Team (AST) and the Pro ssification. The PO focus d ground acquisitions whe e program's setup of indi- tof Work (SOW) which m the CLIN classification. racy of the CLIN includes rice Negotiation Memora or Task Orders. If the AS lition to the SOWs, the te ctivity to improve account	ses on reviewing those nile the AST reviews the ividual CLINs is nay not include all the Other information s, but is not limited to, andums (PNMs), GT/PO consistently am would gain
prevented related to AMC in th	n errors in the fiscal y e current year. Most of he new control, but error	AMC secondary review. year. However, we noted these errors occurred pri rs were also noted subsec	of errors
the accurate classific Infrastructure Servic which incorporates	cation of costs associated ce Provider (NISP). The the information technolo the NRO. Due in part to	l implemented a comprel l with the development of NISP is a far reaching in ogy (IT) infrastructure an the lack of accounting gr	f the NRO frastructure program d application service
responsible for the e to ensure that enhar noted 26 CLINs/TB system assets and gr	stablishment of new con acements to existing grou Os, valued at	tional training to educate tracts or the modification assets are classified a where enhancements seets were occurring but bitalized.	n of existing contracts appropriately. We to ground hardware
preventative controls us Specifically, the controls	ed to accumulate and re s used to establish contra	e traced to design weakn port costs in the PP&E tr acts or to modify contract accurately classified. La	ansaction cycle. ts were not designed to
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preventative controls, the NRO has been dependent on inefficient and costly controls at the end of the process to find and correct errors. These detective controls are complex, heavily dependent on human interaction, and subject to error.

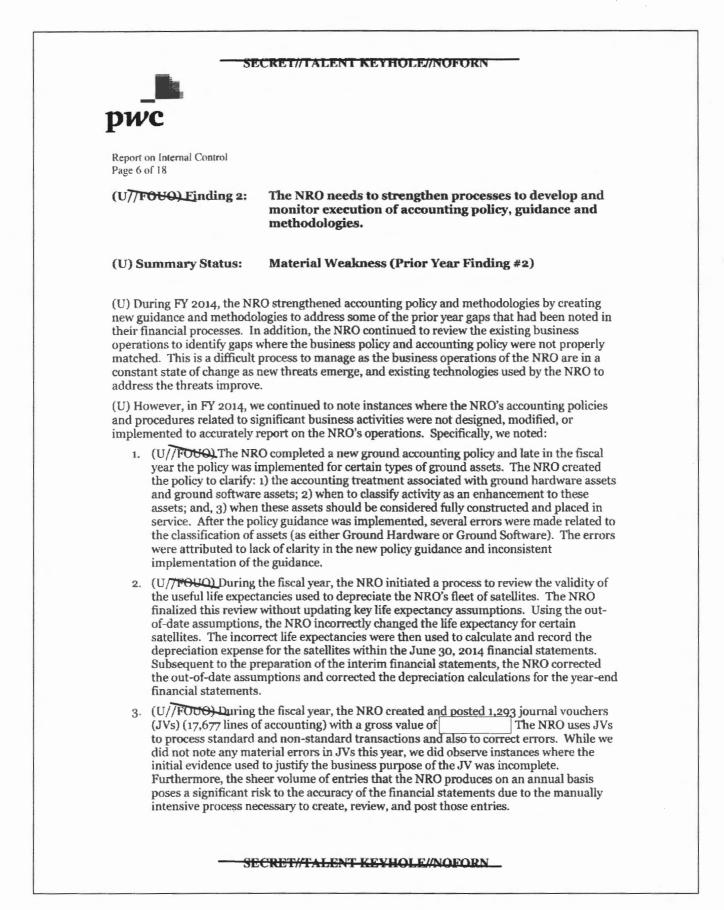
#### (U) Recommendations:

(U//FOUO) The NRO needs to finalize the design and fully implement the CAPCO. This includes the finalization of all CAPCO policies and procedures. The NRO also needs to ensure that training regarding all elements of the CAPCO is provided to all individuals involved with the design, acquisition, installation, and use of PP&E. The NRO needs to complete a "quick review" once the CAPCO is implemented to determine if the internal control objectives regarding classification are being achieved. Also, the NRO needs to develop a set of metrics by which it can monitor and enforce compliance with the CAPCO.

(U) Until such time as the NRO is able to fully implement the CAPCO, we recommend the following:

- (U) The NRO should modify the design of the DCAR review to require the AST/PO teams to review the SOWs, ECPs, PNMs, MFRs and other available documentation associated with the work activity for each CLIN. The AST/PO teams should be required to meet with program officials to confirm the full scope of work activity associated with each CLIN. The information gathered through the review of available documentation and interviews with program officials should be summarized and maintained to support the final decisions of the AST/PO teams.
- 2. (U) The NRO should improve the effectiveness of the new secondary AMC classification control, review the control to determine if additional training regarding the control, or if any adjustments to the control, are warranted.
- 3. (U) The NRO needs to develop and implement a comprehensive set of policies to assess the differing work activity covered by the NISP and to ensure that these costs are accurately classified. Until such time as this guidance is developed and implemented, the NRO needs to develop a methodology to ensure that the commingled NISP costs are accurately allocated to the Balance Sheet and the Statement of Net Cost in order to prevent errors in the financial statements.
- 4. (U) The NRO should evaluate the existing guidance for ground hardware system and ground software system enhancements. If the guidance is incomplete or inaccurate, or if it does not meet the needs of the users, it should be updated as soon as possible. If the guidance is complete and accurate, the NRO should provide additional training to ensure that it is used appropriately to guide decisions related to ground asset enhancements.

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5	prior to the end of the fiscal year are period. We tested 49 obligations ent	a policy in place to ensure that obligations incurred entered in the general ledger in the correct fiscal tered in the general ledger during October 2014 and ns were authorized in FY 2014, but entered in the
6	Control, we recommended that the M	to Report of Independent Auditor's on Internal VRO develop an accounting policy for transferred ot address this area during FY 2014; therefore, the ist.
(U) I	Recommendations:	
	that they are properly aligned with th Furthermore, the NRO needs to ensu of those related to changes in the NR comprehensive accounting policy. T develop and implement appropriate A detailed project management sche ensure the completion of this gap an mindful of existing Federal guidance <i>Implementation Guide for OMB Circ</i> <i>Internal Control, Appendix A, Intern</i> Government Accountability Office's <i>Government</i> ("Green Book"). Policy to support the accounting guidance s principles generally accepted in the b of the policies. Training should be p accurately implemented.	and update significant accounting policies to ensure the NRO's ever-changing business model. ure that all material business transactions, inclusive RO's business model, are supported by a the NRO should use the information gathered to policies to fill the gaps using a top-down approach. dule should be developed and implemented to alysis in a timely manner. The NRO should be e, such as the Chief Financial Officer Council's cular A-123, Management's Responsibility for nal Control over Financial Reporting or the Standards for Internal Control in the Federal guidance developed and the controls implemented should be complete, supported by accounting United States, and approved prior to implementation rovided to ensure that the new policies are
2		process for ensuring that changes or modifications to fully reviewed and approved by the appropriate BPO d.
3	on a monthly, quarterly, and annual adjustments to the existing systems	nprehensive analysis of the types of JVs completed basis. The NRO should ensure that modifications or could not be implemented to eliminate the need for b should also ensure that the business rationale for

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each JV is clearly stated and fully supported prior to the approving or entering the JVs in the general ledger.

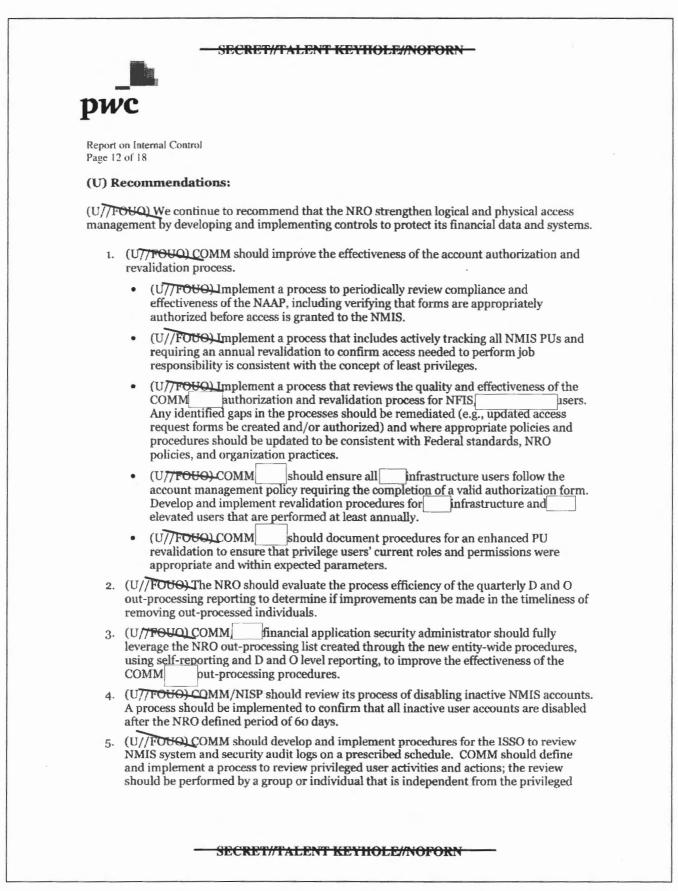
- 4. (U) The NRO needs to fully document the valuation methodologies used to value each class of satellites. The NRO also needs to ensure that appropriate controls are designed and implemented to ensure that satellites are accurately valued when placed in service.
- 5. (U) The NRO should develop a process to ensure obligations are recorded in the appropriate fiscal period.
- 6. (U) The NRO should develop and implement accounting guidance for key transactions, such as the tracking of transferred materials and spares.

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(U//FOUQ) Finding 3:	The NRO needs to strengthen system access and monitoring controls.	
(U) Summary Status:	Significant Deficiency (Prior Year Finding #3)	
National Security Systems ( Selection for National Security management and monitorir	ot effectively develop and implement a process compliant with NSS) Instruction No. 1253, Security Categorization and Control rity Systems, dated March 2012 and NRO policy, for access ag controls. We identified deficiencies in the NRO's controls for and deactivation of users on the significant financial and financial bserved	
(U) Access Authorization, R	Revalidation and Deactivation/Removal	
(U77FOUQ) The core NRO (NFIS)	financial systems include the NRO Financial Information System	
which are supported	by the NRO Management Information System (NMIS). Each of e access management process for authorization, revalidation, and	
manage NMIS accourequired to have a se noted 3 NMIS Furthermore, the N access based on an i	und NRO-wide: The NRO Account Action Process (NAAP) is used to int authorization and revalidation. NMIS privileged users (PU) are eparate form completed and authorized for elevated access. We PUs sampled did not have a NAAP or a PU request form on file. RO relies on an informal, manual process to revalidate NRO-wide PU ncomplete population, evidenced by the fact that 4 PUs icluded in the NRO-wide PU tracking database.	
after proper authori appropriate approva application users dio 1 PU of		
infrastructure users.		
infrastructure users.		

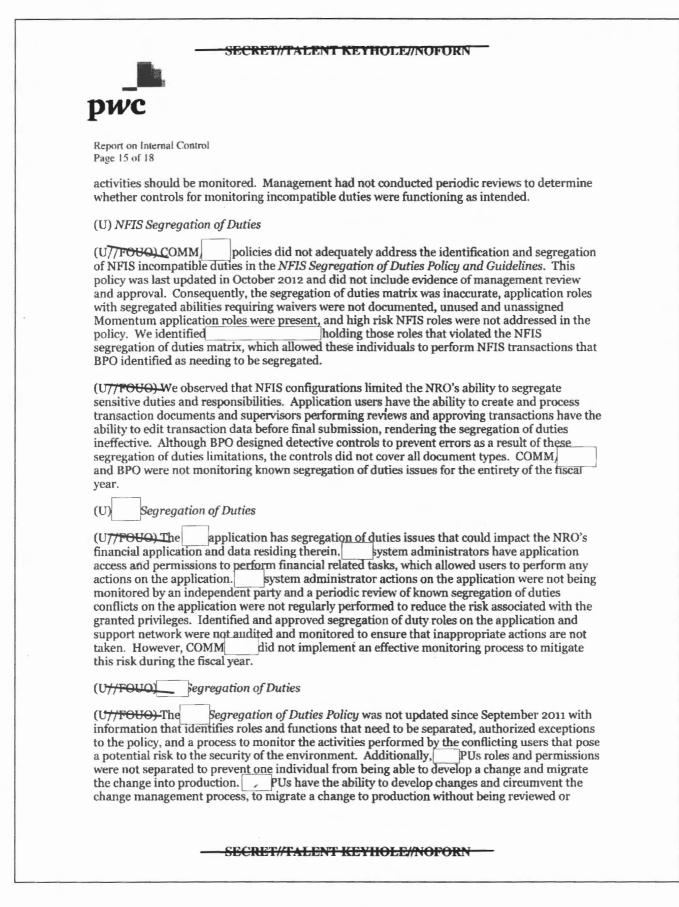
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identify, deactivate, and individuals. The proce (AORS), which is a self	e fiscal year, the NRO implemented changes to its out-processing to d remove network and application access for terminated and transferred ss leverages the Automated Out-processing and Relocation System -reporting system, and added a quarterly Directorate and Office (D and rting of all separated and transferred individuals. While this additional	
step is time intensive. i	t has partially mitigated	
	However, the D and O quarterly reporting process can	
take COMM	access. user	
accounts. Based on ou the significant financia	r testing, we identified out-processed individuals with active accounts on	
<ul> <li>(U//<del>FOUO)</del> 21</li> <li>(U/<del>/FOUO)</del></li> <li>(U/<del>/FOUO)</del></li> <li>(U/<del>/FOUO)</del></li> <li>NRO.</li> </ul>	<b>NFIS</b> users maintained an active account after separating from the NRO. sers maintained an active account after separating from the NRO. ser maintained an active elevated account after separating from the	
• (U/7 <del>FOUO</del> )	users could not validate the continued need for elevated access ng within the NRO.	
Assurance, and Inform Management Informa 52-2, System Access, re consecutive days. This disabling deficiencies.	Business Function (NBF) 50, Information Technology, Information nation Management (IT-IA-IM) NRO Directive (ND) 53-22, NRO tion System Account Qualifications and Access Management, and ND equire user accounts to be disabled if inactive for more than 60 process helps minimize the impact of the out-processing and account However, the NMIS inactivity review process was not operating RO did not deactivateNMIS accounts after 60 days of inactivity.	7
(U77FOUO) Additional	lly, we observed	
(U) Monitoring		
collection of audit logs deficiencies in the NRC	nation Assurance Standards Document (IASD) Revision B requires the and the review of the audit logs as a monitoring control. We observed D's monitoring procedures at all three levels tested; (1) NMIS network se level, and (3) financial applications level.	
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(U//FOCO) The NMIS System Security Plan (SSP) requires the Information System Security Officer (ISSO) to collect and review audit logs. The COMM ISSO did not provide evidence of any log reviews. Additionally, the NMIS SSP does not establish a review schedule and does not identify the key events that should be reviewed by the ISSO. We noted that NMIS system administrators developed a process to review audit logs and provided evidence of the review; however, this process did not mitigate the lack of an independent review of system administrator activity.	
(U <del>//FOUO) C</del> OMM to capture	
audit logs generated by the financial applications at the levels using ArcSight. Though system, application, and security logs were collected towards the end of the fiscal year, ArcSight was unavailable because of resulting in Enterprise Network, NFIS, and ogs not being captured for months. Additionally, COMM, experienced intermittent failures with its As a result of these two simultaneous failures, COMM was unable to retain complete audit logs for these months. After the recovery of ArcSight, COMM, lid not review the audit logs because they did not configure ArcSight to identify and log the key areas of risk. Consequently, the volume of logs generated outmatched COMM ability to adequately review and clear the logs.	
(U//FOUC) COMM did not perform adequate monitoring at the application level for NFIS around sensitive transaction data and processes supporting financial data. COMM/	(b (b
transactions and reference data has not been defined by the data owners of NFIS and for periodic review to confirm the proper processing of transactions in the applications. NFIS allows for approved users to perform overrides on the application and these actions are captured through audit logs. Although a review of the overrides is performed, it is not designed to assess if the override was appropriate. Additionally, COMM and BPO did not perform periodic reviews of reference data, threshold, or reports to ensure the completeness, accuracy, and validity of the information output from the financial applications.	
(U//FOUO) The implementation of effective access <u>controls across the NRO is fundamental</u> to creating a secure set of controls designed to restrict	(b (b
<u> </u>	



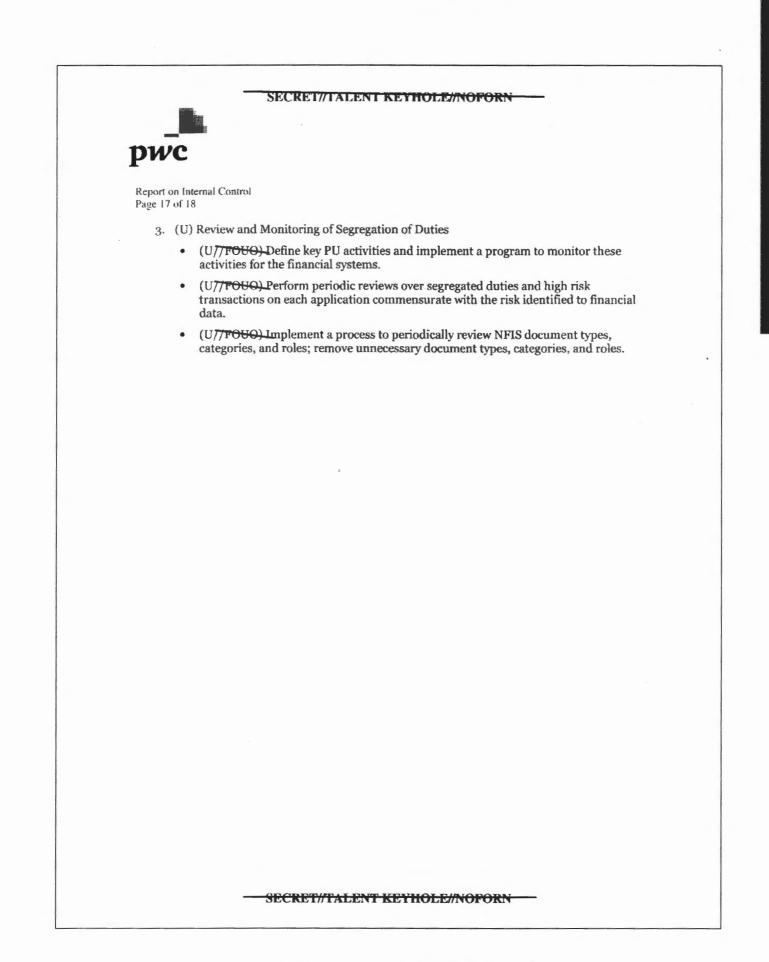
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<ul> <li>users. The reviewer should maintain a record of the audit log review to completion and action taken to address any unusual activity.</li> <li>6. (U//FOUOLCOMM should develop and implement procedures to COMM system, application, and security logs on a prescribed sch reviewer(s) should maintain a record of the audit log review to evidence</li> </ul>	o review aedule. The
action taken to address any unusual activity. COMM should coor NFIS, data owners to define key areas of risk requiring reprocedures for the review of these key areas. COMM should fully and implement the process to capture and effectively review audit logs functional transactions and changes to data, as well as identifying a mo	dinate with the eview and develop v evaluate, finalize, related to key
7. (U//FOUQ) COMM should identify and document hardware and support key processes within the Enterprise Network. For each p and software identified, a contingency plan should be developed and do will lead to the timely reconstitution of the hardware or software in the Management should also determine and document acceptable downtin hardware and software identified.	iece of hardware ocumented which e event of failures.
8. (U/ <del>7FOUO) CO</del> MM should implement a process that includes actively ndividuals and requiring an annual revalidation to confirm need for data center access at these facilities according to job function.	n the continuing
Results of the review should be doc maintained.	umented and
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Report on Internal Control Page 14 of 18	
(U <del>//FOUO) E</del> inding 4:	The NRO needs to strengthen financial system and application segregation of duties.
(U) Summary Status:	Significant Deficiency (New Finding)
restrictions considering in Enterprise Network, NFIS of the NRO's controls segr environments as well as w Control deficiencies relate	egating key functionalities in the system and application eaknesses in monitoring individuals with approved conflicting duties. In the segregation of duties increase the potential that errors or erformed without the appropriate checks necessary to protect the
(U) Enterprise Netw	ork Segregation of Duties
2014. This policy and pro the organizations PUs acro procedures were in exister not accurately reflect the of align with current system provide sufficient granular appropriately segregated for segregated for information administration, data admi system engineering.	nce for four and a half months of the fiscal year, we noted that it did operating environment. Specifically, the policy and procedures did not roles as defined in the Linux, Oracle, and Windows environments nor rity of system permissions to determine whether access was for all PUs. As a result, PU access and permissions were not a security management, network administration, system inistration, quality assurance/testing, application programming, and
move changes through the COMM did not sepa being able to develop a change approvals. Additionally, C monitor logs for system, a to confirm compliance wit segregate PU access betwee develop an unauthorized of	ange and migrate the change into production without appropriate



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ermissio	. COMM/ has not performed an analysis of the application's roles and ons to identify sensitive transactions and incompatible duties. As a result, COMM, nonitoring users with access to sensitive and incompatible.
ssigned f duties	(1) The lack of an up-to-date segregation of duties policy could result in a user being conflicting or incompatible roles. The lack of policy and implementation of segregation presents a risk that individuals could perform actions on the application that could impact financial data without the knowledge of management.
U) Rec	ommendations:
uties po	We recommend that COMM develop, refine, and implement its segregation of licies and procedures, including identifying segregation conflicts and implementing ng of those actions. Specifically, COMM should:
1. ((	J) Segregation of Duties Policy and Procedures
•	(U7/FOUQ) Update and implement the Segregation of Duties Policy and Guide to identify roles, responsibilities, and functions, as they are defined in the system, which need to be separated among PUs. Conflicting roles and permissions should be defined, formally approved, and monitored by independent personnel. Procedures and controls should be developed, documented, and implemented to verify that new users are not granted incompatible duties. Procedures and controls should be developed, documented to periodically review all PU access to verify that users have not been granted incompatible duties.
	(U7/FOUQ) Implement a process to periodically review and update the NFIS Segregation of Duties Policy and Guidelines. Application changes such as new document types, categories, roles, and waivers should be reflected in the policy. All sensitive transactions and activities, including vendor table access and the ability to create/edit and process document types should be identified within the policy.
•	(U//FOUO)-Update and implement the segregation of duties policy which identifies roles and functions needed to be separated among users, requires documentation of exceptions to the segregation of duties policy, and involves a process to monitor the activities performed by users with conflicting roles.
2. (L	J) Application Segregation of Duties
•	(U7/FOUQ) Research and implement a solution to mitigate the risk to financial data with regard to the NFIS processes that allow for the ability to "create and process" a document type or edit transaction data by the reviewer/approver before final processing. The ability for

(b)(3) (b)(5)



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#### \* \* \* \* \* \* \*

#### (U) Response to Findings

(U) The NRO's written response to the findings identified in our audit is included immediately following the audit reports. NRO's response was not subjected to the auditing procedures applied in the audit of the financial statements and accordingly, we express no opinion on it.

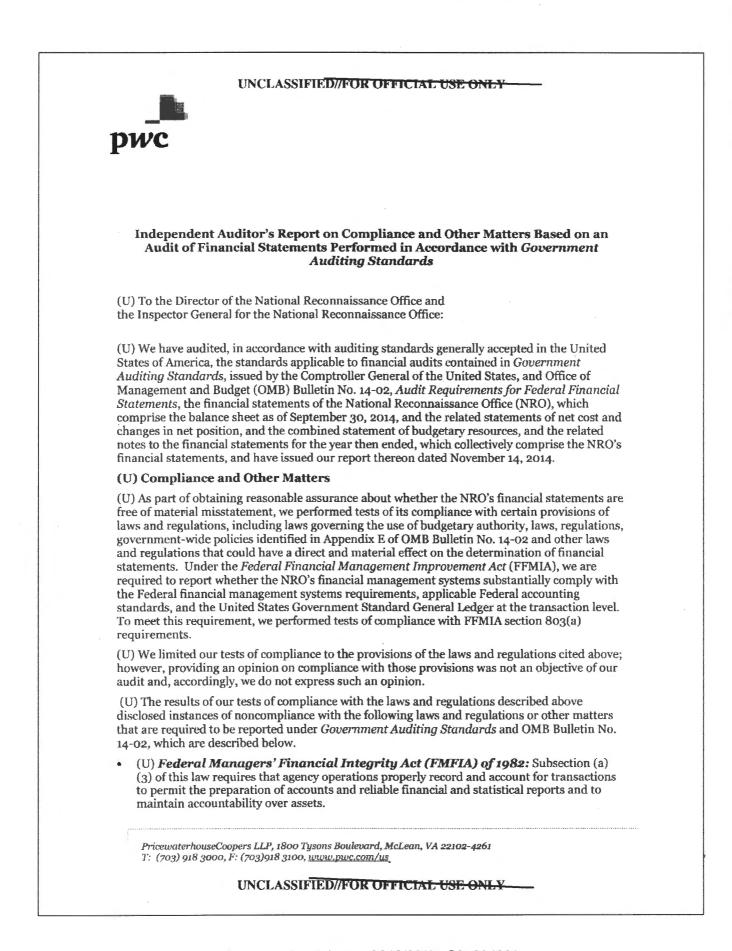
#### (U) Purpose of this Report

(U) This purpose of this report is solely to describe the scope of our testing of internal control and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control. Accordingly, this communication is not suitable for any other purpose.

PRICEWATERHANS COOPERA LLP

McLean, VA November 14, 2014

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Report on Compliance and Other Matters Page 3 of 3

(U) Significant facts pertaining to the matters referred to above, including recommendations for remedial actions are discussed in a separate Report of Independent Auditor's on Internal Control, dated November 14, 2014.

#### (U) Purpose of this Report

(U) The purpose of this report is solely to describe the scope of our testing of compliance and the results of that testing, and not to provide an opinion on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's compliance. Accordingly, this communication is not suitable for any other purpose.

PRICEWATERHANS COPENS LLP

McLean, VA November 14, 2014

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## (U) FINANCIAL STATEMENTS

(U) The NRO prepares its illustrative financial statements in accordance with OMB Circular No. A-136, *Financial Reporting Requirements.* Figure 32 below summarizes the financial statements required by OMB, as well as those that are applicable to the NRO.

### (U) Figure 32 - Summary of NRO Financial Statements

(U) Financial Statement	(U) Description	
(U) Balance Sheet	(U) The balance sheet presents, as of a specific time, amounts of future economic benefits owned or managed by the NRO (assets), amounts owed by the NRO (liabilities), and amounts which comprise the difference (net position).	
(U) Statement of Net Cost (SNC)	(U) The SNC presents the NRO's net cost of operations, as a whole, by major responsibility segments, which align with the goals and outputs of the NRO mission, as described in Figure 33 in Note 1 – <i>Significant Accounting Policies</i> .	
(U) Statement of Changes in Net Position (SCNP)	(U) The SCNP reports the change in net position during the reporting period, which is affected by changes in cumulative results of operations and unexpended appropriations.	
(U) Statement of Budgetary Resources (SBR)	(U) The SBR provides information about how budgetary resources are made available as well as their status at the end of the reporting period. It is the only financial statement derived from the NRO's budgetary general ledger accounts. The SBR has been reformatted starting in FY 2013 to conform with the requirements found in OMB Circular No. A-136.	
(U) Statement of Custodial Activity (SCA)	(U) The SCA is required for entities that collect nonexchange revenue for the General Fund of the Treasury, a trust fund, or other recipient entities. The NRO collects and returns immaterial nonexchange revenue to the Treasury by the end of the FY, and therefore does not produce the SCA.	

Figure 32 is (U)

# BALANCE SHEET

As of 30 September 2014 and 2013 (Dollars in Thousands)

·	2014	2013
ASSETS (Note 2): Intragovernmental: Fund Balance With Treasury (Note 3) Appropriations Receivable (Note 5) Advances to Others (Note 6) Total Intragovernmental (b)(1) (b)(3) 10 USC $^{\perp}$ 424		
Cash and Other Monetary Assets (Note 4) General Property, Plant and Equipment, Net (Note 7) Other (Note 9)		
TOTAL ASSETS		
Heritage Assets (Note 8)		
LIABILITIES (Note 10): Intragovernmental: Accounts Payable (Note 13) Advances From Others (Note 15) Other (Note 14) Total Intragovernmental		
Accounts Payable (Note 13) Other (Note 14)		
TOTAL LIABILITIES		
Commitments and Contingencies (Note 17)       (b)(1)         NET POSITION:       (b)(3) 10 USC <sup>⊥</sup> 424         Unexpended Appropriations       Cumulative Results of Operations		
TOTAL NET POSITION		
TOTAL LIABILITIES AND NET POSITION		

The accompanying notes are an integral part of these statements.

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# STATEMENT OF NET COST

# For the Years Ended 30 September 2014 and 2013

(Dollars in Thousands)

Program Costs by Responsibility Segr	nent (Notes 18 and 19):	2014	2013
RESEARCH & TECHNOLOGY			
Gross Costs Less: Earned Revenue TOTAL NET COSTS	(b)(1) (b)(3) 10 USC <sup>⊥</sup> 424		
MISSION GROUND STATIONS			
Gross Costs Less: Earned Revenue TOTAL NET COSTS	(b)(1) (b)(3) 10 USC <sup>⊥</sup> 424		
ACQUISITION MANAGEMENT	F		
Gross Costs Less: Earned Revenue	(b)(1) (b)(3) 10 USC <sup>⊥</sup> 424		
TOTAL NET COSTS			
LAUNCH	,		
Gross Costs Less: Earned Revenue			
TOTAL NET COSTS	(b)(1)		
Cost Not Assigned To Programs	(b)(3) 10 USC <sup>⊥</sup> 424		
Less: Earned Revenues Not Attributed to	Programs		
NET COST OF OPERATIONS			

The accompanying notes are an integral part of these statements.

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# STATEMENT OF CHANGES IN NET POSITION For the Years Ended 30 September 2014 and 2013

(Dollars in Thousands)

		2014	2013
Cumulative Results of Operations:	· ·		
Beginning Balance			
Budgetary Financing Sources:			
Appropriations Used			
Other Financing Sources (Non-Exchange):	0.3		
Transfers In/Out Without Reimbursement	(b)(1)		
Imputed Financing (Note 11)	(b)(3) 10 USC <sup>⊥</sup> 424		
TOTAL FINANCING SOURCES			
NET COST OF OPERATIONS			
NET CHANGE			
CUMULATIVE RESULTS OF OPERATIONS			
Unexpended Appropriations:			
Beginning Balance			
Budgetary Financing Sources:			
Appropriations Received	(b)(1)		
Appropriations Transferred In/Out	(b)(1) (b)(3) 10 USC <sup>⊥</sup> 424		
Other Adjustments			
Appropriations Used			
Total Budgetary Financing Sources			
TOTAL UNEXPENDED APPROPRIATIONS			
NET POSITION			
The accompanying notes are an integral part of thes	se statements.	- (5	ECRET//NOFOR

# STATEMENT OF BUDGETARY RESOURCES For the Years Ended 30 September 2014 and 2013

(Dollars in Thousands)

		2014	2013
BUDGETARY RESOURCES:			
Unobligated Balance Brought Forward, October 1, Gross Recoveries of Prior Year Unpaid Obligations Other Changes in Unobligated Balance			
Unobligated Balance from Prior Year Budget Authority, Net Appropriations Spending Authority from Offsetting Collections	(b)(1) (b)(3) 10 USC <sup>⊥</sup> 424	Ļ	
TOTAL BUDGETARY RESOURCES			
STATUS OF BUDGETARY RESOURCES:			
Obligations Incurred (Note 20) Unobligated Balance, End of Period Apportioned (Note 3) Unapportioned (Note 3)	(b)(1) (b)(3) 10 USC <sup>⊥</sup> 424	l .	
Total Unobligated Balance, End of Period			0
TOTAL STATUS OF BUDGETARY RESOURCES			
CHANGE IN OBLIGATED BALANCE:			
Unpaid Obligations: Unpaid Obligations, Brought Forward, October 1 Obligations Incurred (Note 20) Outlays, Gross Recoveries of Prior Year Unpaid Obligations			
Unpaid Obligations, End of Period, Gross Memorandum (non-add) entries: Obligated Balance, Start of Year Obligated Balance, End of Period, Net (Note 3)	(b)(1) (b)(3) 10 USC <sup>⊥</sup> 424		
BUDGET AUTHORITY AND OUTLAYS, NET:			
Budget Authority, Gross Actual Offsetting Collections			
BUDGET AUTHORITY, NET			4
Outlays, Gross Actual Offsetting Collections Outlays, Net			
AGENCY OUTLAYS, NET			

The accompanying notes are an integral part of these statements.

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