

**Information Technology
Management Letter for
the Transportation
Security Administration
Component of the FY 2016
Department of Homeland
Security Financial
Statement Audit**





DHS OIG HIGHLIGHTS

Information Technology Management Letter for the Transportation Security Administration Component of the FY 2016 Department of Homeland Security Financial Statement Audit

June 21, 2017

Why We Did This Audit

Each year, our independent auditors identify component-level information technology (IT) control deficiencies as part of the DHS consolidated financial statement audit. This letter provides details that were not included in the fiscal year (FY) 2016 DHS Agency Financial Report.

What We Recommend

We recommend that TSA, in coordination with the DHS Chief Information Officer and Acting Chief Financial Officer, make improvements to TSA's financial management systems and associated information technology security program.

For Further Information:

Contact our Office of Public Affairs at (202) 254-4100, or email us at DHS-OIG.OfficePublicAffairs@oig.dhs.gov

What We Found

We contracted with the independent public accounting firm KPMG, LLP to perform the audit of the consolidated financial statements of the U.S. Department of Homeland Security (DHS) for the year ended September 30, 2016. KPMG evaluated selected general IT controls (GITC) and business process application controls at the Transportation Security Administration (TSA). KPMG determined that TSA took corrective action to address one prior-year IT control deficiency by improving access controls for one system. However, KPMG continued to identify GITC deficiencies related to access controls for TSA's core financial and feeder systems.

The deficiencies collectively limited TSA's ability to ensure that critical financial and operational data were maintained in such a manner as to ensure their confidentiality, integrity, and availability. In addition, certain of these deficiencies adversely impacted internal controls over DHS' financial reporting and its operation and therefore are considered to collectively represent a material weakness reported in the FY 2016 DHS Agency Financial Report.



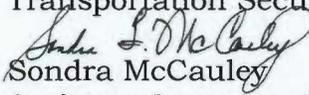
OFFICE OF INSPECTOR GENERAL
Department of Homeland Security

Washington, DC 20528 / www.oig.dhs.gov

June 21, 2017

MEMORANDUM FOR: Russell Roberts
Acting Chief Information Officer
Transportation Security Administration

Pat A. Rose
Chief Financial Officer
Transportation Security Administration

FROM: 
Sondra McCauley
Assistant Inspector General
Office of Information Technology Audits

SUBJECT: *Information Technology Management Letter for the
Transportation Security Administration Component of the
FY 2016 Department of Homeland Security Financial
Statement Audit*

Attached for your information is our final report, *Information Technology Management Letter for the Transportation Security Administration Component of the FY 2016 Department of Homeland Security Financial Statement Audit*. This report contains comments and recommendations related to information technology internal control deficiencies. The deficiencies did not meet the criteria to be reported in the *Independent Auditors' Report on DHS' FY 2016 Financial Statements and Internal Control over Financial Reporting*, dated November 14, 2016, which was included in the FY 2016 DHS Agency Financial Report.

The independent public accounting firm KPMG, LLP conducted the audit of DHS' FY 2016 financial statements and is responsible for the attached information technology management letter and the conclusions expressed in it. We do not express opinions on DHS' financial statements or internal control, nor do we provide conclusions on compliance with laws and regulations. We will post the final report on our website.

Please call me with any questions, or your staff may contact Kevin Burke, Acting Director, Information Systems and Acquisitions Division, at (202) 254-5450.

Attachment



KPMG LLP
Suite 12000
1801 K Street, NW
Washington, DC 20006

December 15, 2016

Office of Inspector General,
U.S. Department of Homeland Security, and
Chief Information Officer and Chief Financial Officer,
Transportation Security Administration,
Washington, DC

Ladies and Gentlemen:

We planned and performed our audit of the consolidated financial statements of the U.S. Department of Homeland Security (DHS or Department) as of, and for the year ended, September 30, 2016, 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 Bulletin No. 15-02, *Audit Requirements for Federal Financial Statements*. We considered internal control over financial reporting (internal control) as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements. In conjunction with our audit of the consolidated financial statements, we also performed an audit of internal control over financial reporting in accordance with attestation standards issued by the American Institute of Certified Public Accountants.

During our audit we noted certain matters involving internal control and other operational matters at the Transportation Security Administration (TSA), a component of DHS, that are presented for your consideration. These comments and recommendations, all of which have been discussed with the appropriate members of management, are intended to improve internal control or result in other operating efficiencies.

We also noted certain internal control deficiencies at TSA during our audit that, in aggregate and when combined with certain internal control deficiencies identified at certain other DHS components, contributed to a material weakness in information technology (IT) controls and financial system functionality at the DHS Department-wide level. Specifically, with respect to financial systems at TSA, we noted certain matters in the general IT control areas of access controls. These matters are described in the *Findings and Recommendations* section of this letter.

Additionally, at the request of the DHS Office of Inspector General (OIG), we performed additional non-technical information security procedures to identify instances in which TSA personnel did not adequately comply with requirements for safeguarding sensitive material or assets from unauthorized access or disclosure. These matters are described in the *Observations Related to Non-Technical Information Security* section of this letter.



We have provided a description of the key TSA financial system and IT infrastructure within the scope of the Fiscal Year (FY) 2016 DHS financial statement audit in Appendix A, and a listing of each TSA IT Notice of Finding and Recommendation communicated to management during our audit in Appendix B.

During our audit we noted certain matters involving financial reporting internal controls (comments not related to IT) and other operational matters at TSA, including certain deficiencies in internal control that we consider to be material weaknesses, and communicated them in writing to management and those charged with governance in our *Independent Auditors' Report* and in a separate letter to the OIG and the TSA Chief Financial Officer.

Our audit procedures are designed primarily to enable us to form opinions on the FY 2016 DHS consolidated financial statements and on the effectiveness of internal control over financial reporting, and therefore may not bring to light all deficiencies in policies or procedures that may exist. We aim, however, to use our knowledge of TSA's organization gained during our work to make comments and suggestions that we hope will be useful.

We would be pleased to discuss these comments and recommendations with you at any time.

The purpose of this letter is solely to describe comments and recommendations intended to improve internal control or result in other operating efficiencies. Accordingly, this letter is not suitable for any other purpose.

Very truly yours,

KPMG LLP

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OBJECTIVE, SCOPE, AND APPROACH

Objective

We audited the consolidated financial statements of the U.S. Department of Homeland Security (DHS or Department) for the year ended September 30, 2016 (hereinafter, referred to as the “fiscal year (FY) 2016 DHS consolidated financial statements”). In connection with our audit of the FY 2016 DHS consolidated financial statements, we performed an evaluation of selected general information technology (IT) controls (GITC) and IT application controls at the Transportation Security Administration (TSA), a component of DHS, to assist in planning and performing our audit engagement. At the request of the DHS Office of Inspector General (OIG), we also performed additional information security testing procedures to assess certain non-technical areas related to the protection of sensitive IT and financial information and assets.

Scope and Approach

General Information Technology Controls

The U.S. Government Accountability Office (GAO) issued the *Federal Information System Controls Audit Manual* (FISCAM), which formed the basis for our GITC and IT ELC evaluation procedures.

FISCAM was designed to inform financial statement auditors about IT controls and related audit concerns, to assist them in planning their audit work and to integrate the work of auditors with other aspects of the financial statement audit. It also provides guidance to auditors when considering the scope and extent of review that generally should be performed when evaluating GITCs, IT ELCs, and the IT environment of a Federal agency. FISCAM defines the following five control categories to be essential to the effective operation of GITCs, IT ELCs, and the IT environment:

1. *Security Management* – controls that provide a framework and continuing cycle of activity for managing risk, developing security policies, assigning responsibilities, and monitoring the adequacy of computer-related security controls.
2. *Access Control* – controls that limit or detect access to computer resources (data, programs, equipment, and facilities) and protect against unauthorized modification, loss, and disclosure.
3. *Configuration Management* – controls that help prevent unauthorized changes to information system resources (software programs and hardware configurations) and provide reasonable assurance that systems are configured and operating securely and as intended.
4. *Segregation of Duties* – controls that constitute policies, procedures, and an organizational structure to manage who can control key aspects of computer-related operations.

5. *Contingency Planning* – controls that involve procedures for continuing critical operations without interruption, or with prompt resumption, when unexpected events occur.

Although each of these FISCAM categories were considered during the planning and risk assessment phase of our audit, we selected GITCs and IT ELCs for evaluation based on their relationship to the ongoing effectiveness of process-level automated controls or manual controls with one or more automated components. This includes those controls that depend on the completeness, accuracy, and integrity of information provided by the entity in support of our financial audit procedures. Consequently, FY 2016 GITC procedures evaluated at TSA did not necessarily represent controls from each FISCAM category.

Business Process Application Controls

Where relevant GITCs were operating effectively, we tested selected IT application controls (process-level controls — fully automated or manual with an automated component) on financial systems and applications to assess internal controls over input, processing, and output of financial data and transactions.

FISCAM defines Business Process Application Controls (BPAC) as the automated and/or manual controls applied to business transaction flows; and related to the completeness, accuracy, validity, and confidentiality of transactions and data during application processing. BPACs typically cover the structure, policies, and procedures that operate at a detailed business process (cycle or transaction) level and operate over individual transactions or activities across business processes.

Financial System Functionality

In recent years, we have noted that limitations in TSA's financial systems' functionality may be inhibiting the agency's ability to implement and maintain internal controls, including effective GITCs and IT application controls supporting financial data processing and reporting. Many key financial feeder systems are not fully integrated with the main financial system. Therefore, in FY 2016, we continued to evaluate and consider the impact of financial system functionality on internal control over financial reporting.

Non-Technical Information Security Testing

To complement our IT controls test work, we conducted limited after-hours physical security testing and social engineering at selected TSA component facilities to identify potential weaknesses in non-technical aspects of IT security. This includes those related to component personnel awareness of policies, procedures, and other requirements governing the protection of sensitive IT and financial information and assets from unauthorized access or disclosure. This testing was performed in accordance with the FY 2016 DHS *Security Testing Authorization Letter* (STAL) signed by KPMG LLP, DHS OIG, and DHS management.

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Appendix A provides a description of the key TSA financial systems and IT infrastructure within the scope of the FY 2016 DHS financial statement audit.

SUMMARY OF FINDINGS

During our FY 2016 assessment of GITCs and IT application controls, we noted that TSA took corrective action to address one prior-year IT control deficiency by improving access controls for one system. However, we continued to identify GITC deficiencies related to access controls for TSA core financial and feeder systems. New control deficiencies reflected weaknesses over controls for systems that were new to the scope of GITC testing for the FY 2016 audit.

The conditions supporting our findings collectively limited TSA's ability to ensure that critical financial and operational data were maintained in such a manner as to ensure their confidentiality, integrity, and availability. In addition, certain of these deficiencies at TSA adversely impacted the internal controls over DHS' financial reporting and its operation and we consider them to collectively contribute to a Department-wide material weakness regarding IT controls and financial system functionality for DHS, under standards established by the American Institute of Certified Public Accountants and the U.S. GAO.

Of the six IT Notices of Findings and Recommendations (NFR) issued during our FY 2016 testing at TSA, one was a repeat finding, either wholly or in part from the prior year, and five were new findings. The six IT NFRs issued represent deficiencies and observations related to two of the five FISCAM GITC categories.

The majority of the deficiencies that our audit identified were related to noncompliance with financial system controls. According to DHS Sensitive Systems Policy Directive 4300A, *Information Technology Security Program*, National Institute of Standards and Technology guidance, and TSA policies, financial system controls lacked proper documentation, were not fully designed and implemented, were inadequately detailed, and were inconsistently implemented. The most significant weaknesses from a financial statement audit perspective continued to include unauthorized or inadequately monitored access to, and activity within, system components for key TSA financial applications.

During our IT audit procedures, we also evaluated and considered the impact of financial system functionality on financial reporting. In recent years, we have noted that limitations in TSA's financial systems' functionality may be inhibiting TSA's ability to implement and maintain effective internal control and to effectively and efficiently process and report financial data. Many key financial and feeder systems have not been substantially updated since being inherited from legacy agencies several years ago. Many key TSA financial systems were not compliant with Federal financial management system requirements as defined by the *Federal Financial Management Improvement Act of 1996* (FFMIA) and Office of Management and Budget Circular Number A-123 Appendix D, *Compliance with FFMIA*.

Although the recommendations made by us should be considered by TSA, it is ultimately the responsibility of TSA management to determine the most appropriate method(s) for addressing the deficiencies identified.

FINDINGS AND RECOMMENDATIONS

Findings

During our audit of the FY 2016 DHS consolidated financial statements, we identified the following GITC deficiencies at TSA:

Access Controls

- Strong password requirements were not consistently enforced on databases supporting financial applications.
- Recertification of user accounts was not performed annually as required by policy.
- Access was provided to database users even though approval of this access was not documented on access request forms.
- System access was not timely removed for terminated and/or separated personnel.

Recommendations

We recommend that the TSA Office of the Chief Information Officer (OCIO) and Office of the Chief Financial Officer (OCFO), in coordination with the DHS OCIO and the DHS OCFO, make the following improvements to TSA's financial management systems and associated IT security program (in accordance with TSA and DHS requirements, as applicable):

Access Controls

- Enhance password complexity rules to adhere to DHS guidelines.
- Resume the annual account recertification process.
- Ensure management approval of all database accounts is documented on access request forms and update any legacy account forms missing required approvals.
- Update processes to ensure that system access is revoked timely when employees and/or contractors separate from TSA.

OBSERVATIONS RELATED TO NON-TECHNICAL INFORMATION SECURITY

To complement our IT controls test work during the FY 2016 audit, we performed additional non-technical information security procedures at TSA. These procedures included after-hours physical security walkthroughs and social engineering to identify instances where TSA personnel did not adequately comply with requirements for safeguarding sensitive material or assets from unauthorized access or disclosure. These procedures were performed in accordance with the FY 2016 *Security Testing Authorization Letter* (STAL) signed by DHS OIG management, KPMG management, and DHS management.

Social Engineering

Social engineering is defined as the act of manipulating people into performing actions or divulging sensitive information. The term typically applies to trickery or deception for the purpose of gathering information or obtaining computer system access. The objective of our social engineering tests was to identify the extent to which TSA personnel were willing to divulge network or system passwords that, if exploited, could compromise sensitive TSA information.

To conduct this testing, we made phone calls from various TSA locations at various times throughout the audit. Posing as TSA technical support personnel, we attempted to solicit access credentials from TSA users. Attempts to log into TSA systems were not performed; however, we assumed that disclosed passwords that met the minimum password standards established by DHS policy were valid exceptions. During social engineering performed at TSA, we attempted to call a total of 71 employees and contractors and reached 32. Of those 32 individuals with whom we spoke, no individual divulged passwords in violation of DHS policy.

The selection of attempted or connected calls was not statistically derived, and, therefore, the results described here should not be used to extrapolate to TSA as a whole.

After-Hours Physical Security Walkthroughs

Multiple DHS policies, including the DHS Sensitive Systems Policy Directive 4300A, the DHS Privacy Office *Handbook for Safeguarding Sensitive Personally-Identifiable Information (PII)*, and DHS Management Directive 11042.1, *Safeguarding Sensitive but Unclassified (SBU) (FOUO) Information*, mandate the physical safeguarding of certain materials and assets that, if compromised either due to external or insider threat, could result in unauthorized access, disclosure, or exploitation of sensitive IT or financial information.

We performed procedures to determine whether TSA personnel consistently exercised responsibilities related to safeguarding sensitive materials as defined in these policies. Specifically, we performed escorted walkthroughs of workspaces – including cubicles, offices, shared workspaces, and/or common areas (e.g., areas where printers were hosted) – at TSA facilities that processed, maintained, and/or had access to financial data during FY 2016. We

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inspected workspaces to identify instances where materials designated by DHS policy as requiring physical security from unauthorized access were left unattended. Exceptions noted were validated by designated representatives from TSA, DHS OIG, and DHS OCIO.

During after-hours physical security walkthroughs performed at TSA, we inspected a total of 51 workspaces. Of those, 6 were observed to have material – including, but not limited to, unsecured laptops and external media, system passwords and access credentials, information marked “FOUO”, and documents containing sensitive PII – left unattended and unsecured after business hours in violation of DHS policy.

The selection of inspected areas was not statistically derived, and, therefore, the results described here should not be used to extrapolate to TSA as a whole.

Appendix A

Description of Key TSA Financial Systems and IT Infrastructure within the Scope of the FY 2016 DHS Financial Statement Audit

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Below is a description of the significant TSA financial management systems and supporting IT infrastructure included in the scope of the FY 2016 DHS financial statement audit.

Core Accounting System (CAS)

CAS is a web-based major application and the official accounting system of record for TSA. It is used to record all income and expenses and create income statements, balance sheets, and other financial reports to show financial condition. Accounting and financial management functions that CAS supports include accounts payable, accounts receivable, general and expense ledgers, and asset (including capital asset) management. CAS contains interfaces with internal TSA feeder systems and the systems of external service providers, including the Department of Treasury's Bureau of the Fiscal Service. The U.S. Coast Guard's (Coast Guard) Operations Systems Center (OSC) Detachment Chesapeake, in Chesapeake, VA, hosts the application.

CAS is an Oracle Federal Financials product including an Oracle database with HP-UX and Red Hat Linux-based servers.

The Coast Guard Office of the Director of Financial Operations/Comptroller and the Coast Guard OCIO on behalf of TSA (under the terms established through an interagency agreement between the two Components) host and support CAS. It is exclusively for the TSA user community and, on a limited basis, for Coast Guard personnel performing support services for TSA.

Finance Procurement Desktop (FPD)

FPD is a web-based major application that supports TSA funds management processes by creating and managing simplified procurement documents and maintaining accurate accounting records agency-wide. Functions performed by FPD include budgeting and funds distribution, procurement requests and simplified acquisitions, receipt of goods/services (accruals), and program element status reporting. FPD is integrated with CAS and interfaces with other internal TSA feeder systems, including the Contract Management Information System, and the systems of external service providers such as the Department of Treasury's Bureau of the Fiscal Service.

An Oracle database with Microsoft Windows, HP-UX, and Red Hat Linux-based servers supports the FPD application.

The Coast Guard Office of the Director of Financial Operations/Comptroller and the Coast Guard OCIO on behalf of TSA (under the terms established through an interagency agreement between the two Components) host and support FPD. It is exclusively for the TSA financial management and acquisitions user community and, on a limited basis, for Coast Guard personnel performing support services for TSA. The Coast Guard OSC Detachment Chesapeake, in Chesapeake, VA, hosts the application.

Sunflower Asset Management System

Sunflower is a web-based application that TSA uses for property management. It comprises modules for managing inventory assets, excess assets, agreement assets, and inactive assets, and is integrated with FPD and a fixed assets module within CAS to create assets from purchase orders or receipts.

An Oracle database with Red Hat Linux-based servers supports the Sunflower application.

The Coast Guard Office of the Director of Financial Operations/Comptroller and the Coast Guard OCIO on behalf of TSA (under the terms established through an interagency agreement between the two Components) host and support Sunflower. It is exclusively for the TSA financial management and property management user community. The Coast Guard OSC Detachment Chesapeake, in Chesapeake, VA, hosts the application.

MarkView

MarkView is a web-based application that TSA uses to manage invoice imaging and workflow activities. It interfaces with the accounts payable module within CAS.

An Oracle database with Red Hat Linux-based servers supports the MarkView application.

The Coast Guard Office of the Director of Financial Operations/Comptroller and the Coast Guard OCIO on behalf of TSA (under the terms established through an interagency agreement between the two Components) host and support MarkView. It is exclusively for the TSA financial management and procurement user community and Coast Guard Finance Center support personnel. The Coast Guard's OSC Detachment Chesapeake, in Chesapeake, VA, hosts the application.

Contract Information Management System (CIMS)

CIMS is a contract management system used for contract creation and management. It includes milestone planning, solicitations, award, and closeout. CIMS interfaces with FPD to receive commitments and send contract procurement information. The primary users of CIMS are contracting officers and contracting specialists.

Oracle databases with Microsoft Windows servers support CIMS.

The Coast Guard Office of the Director of Financial Operations/Comptroller and the Coast Guard OCIO on behalf of TSA (under the terms established through an interagency agreement between the two Components) host and support CIMS. It is exclusively for the TSA financial management and procurement user community and Coast Guard Finance Center support personnel. The Coast Guard's OSC Detachment Chesapeake, in Chesapeake, VA, hosts the application.

HRAccess

HRAccess is a collaboration of commercial off-the-shelf (COTS) and government-off-the-shelf (GOTS) information technology systems used to provide human capital services. It integrates a series of electronic and manual human capital services that were previously managed by separate systems or service providers. HRAccess streamlines human capital functions used to collect, store, and disseminate payroll, benefits, and other workforce-related information for employees and candidates.

Oracle databases with Microsoft Windows servers support HRAccess.

TSA Financial Data Warehouse (TFDW)

TFDW is a direct copy (mirror image) of the Coast Guard's CAS MIR. TFDW pulls data from MIR and is used for reporting purposes.

Oracle databases and Red Hat Linux-based servers support TFDW. The Coast Guard Office of the Director of Financial Operations/Comptroller and the Coast Guard OCIO on behalf of TSA (under the terms established through an interagency agreement between the two Components) host and support the application. It is exclusively for the TSA financial management and procurement user community and Coast Guard Finance Center support personnel. The Coast Guard's OSC Detachment Chesapeake, in Chesapeake, VA, hosts the application.

Web Time and Attendance (WebTA)

WebTA is a COTS web-based major application that the U.S. Department of Agriculture's (USDA) National Finance Center (NFC) hosts. NFC's IT Services Division and Risk Management Staff developed, operate, and maintain it. TSA uses NFC and WebTA to process front-end input and certification of TSA time and attendance entries to facilitate payroll processing.

EmpowHR

EmpowHR is a COTS web-based major application that NFC hosts. NFC's IT Services Division and Risk Management Staff developed, operate, and maintain it. DHS components use NFC and EmpowHR to initiate, authorize, and send personnel data to NFC for processing.

Appendix B

FY 2016 IT Notices of Findings and Recommendations at TSA

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FY 2016 NFR #	NFR Title	FISCAM Control Area	New Issue	Repeat Issue
TSA-IT-16-01	Security Awareness Issues Identified During After-Hours Physical Security Testing at TSA	Security Management		X
TSA-IT-16-02	Weakness in HRAccess Database Password Configurations	Access Controls	X	
TSA-IT-16-03	Lack of Periodic Reviews of Access Authorization	Access Controls	X	
TSA-IT-16-04	Ineffective Controls over Removing Access for Inactive and Separated User Accounts	Access Controls	X	
TSA-IT-16-05	Weakness in Management Approving Database Accounts	Access Controls	X	
TSA-IT-16-06	Ineffective Controls over Removing and Disabling Access for Separated Employees in WebTA	Access Controls	X	



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Attention: Hotline
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