441 G St. NW
Washington, DC 20548

September 30, 2025

Mr. Thomas N. Flagg
Chief Information Officer
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Chief Information Officer Open Recommendations: Department of Education

Dear Mr. Flagg:

I am writing to you with respect to your role as the Chief Information Officer (CIO) for the Department of Education (Education). As an independent, non-partisan agency that works for Congress, GAO's mission is to support Congress in meeting its constitutional responsibilities and help improve the performance and ensure the accountability of the federal government. Our work includes investigating matters related to the use of public funds and evaluating programs and activities of the U.S. Government at the request of congressional committees and subcommittees, on the initiative of the Comptroller General, and as required by public laws or committee reports. Our duties include reporting our findings and recommending ways to increase economy and efficiency in government spending. The purpose of this letter is to provide an overview of the open, publicly available GAO recommendations to Education that call for the attention of the CIO.

We identified recommendations that relate to the CIO's roles and responsibilities in effectively managing IT. They include strategic planning, investment management, and information security. We have previously reported on the significance of the CIO's role in improving the government's performance in IT and related information management functions.[1] Your attention to these recommendations will help ensure the secure and effective use of IT at the department.

Currently, Education has 30 open recommendations that call for the attention of the CIO. Each of these recommendations relates to a GAO High-Risk area: (1) Ensuring the Cybersecurity of the Nation or (2) Improving IT Acquisitions and Management.[2] In addition, GAO has designated one of the 30 as a priority recommendation.[3] Fully implementing these open recommendations could significantly improve Education's ability to deter threats and manage its critical systems,

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[1]See for example, GAO, *Federal Chief Information Officers: Critical Actions Needed to Address Shortcomings and Challenges in Implementing Responsibilities*, GAO-18-93 (Washington, D.C.: Aug. 2, 2018).

[2]GAO, *High-Risk Series: Heightened Attention Could Save Billions More and Improve Government Efficiency and Effectiveness*, GAO-25-107743 (Washington, D.C.: Feb. 25, 2025).

[3]Priority recommendations are those that GAO believes warrant priority attention from heads of key departments or agencies. They are highlighted because, upon implementation, they may significantly improve government operations, for example, by realizing large dollar savings; eliminating mismanagement, fraud, and abuse; or making progress toward addressing a high-risk or duplication issue. Since 2015, GAO has sent letters to selected agencies to highlight the importance of implementing such recommendations.

operations, and information. I have summarized selected recommendations here. See the enclosure for a full list, and additional details on the GAO recommendations.

Ensuring the Cybersecurity of the Nation. Education needs to take additional steps to secure the information systems used to carry out its mission. For example, we recommended that the department develop policies and procedures to gain assurance that Federal Family Education Loan lenders have appropriate security and privacy controls in place, and that these controls are being regularly tested and monitored.[4] Until Education implements this recommendation, it will lack visibility into the effectiveness of the protections applied to student aid data.

We also recommended that the department fully implement all event logging requirements as directed by the Office of Management and Budget. Until Education implements this recommendation, there is increased risk that the department will not have complete information from logs on its systems to detect, investigate, and remediate cyber threats.

Improving IT Acquisitions and Management. Education needs to better manage and track its IT resources. For example, we recommended that the Office of Federal Student Aid update its cost estimation guidance for its acquisition programs to incorporate the best practices called for in the GAO *Cost Estimating and Assessment Guide*.[5] Until Education does so, its cost and schedule estimates will continue to be unreliable, impairing the ability of senior leadership to make informed decisions.

Education also needs to fully address statutory requirements for IT portfolio management. Specifically, we recommended that Education complete annual reviews of its IT portfolio consistent with federal requirements. Until Education implements this recommendation, it may miss opportunities to identify areas of duplication within its IT portfolio and to develop strategies to streamline operations and optimize resource allocation.

In addition to GAO's recommendations, the Education Inspector General also has multiple open recommendations in the areas of cybersecurity and IT acquisitions and management. These include cybersecurity recommendations that relate to the department's requirements under the Federal Information Security Modernization Act of 2014.[6] Similarly, Education's independent Financial Statement Auditor has open recommendations related to deficiencies in IT controls at the department. It will be important to address GAO, Inspector General, and Financial Statement Auditor recommendations.

Copies of this letter are being sent to the appropriate congressional committees and the Federal CIO. The letter will also be available at no charge on the GAO website at https://www.gao.gov. In addition, we sent a separate letter related to department-wide priority recommendations, which also conveys the importance of enhancing information technology and cybersecurity, to

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[4]Federal Family Education Loan lenders are non-federal lenders, such as banks, credit unions, or other lending institutions, that made loans to students in the past and continue to service these loans.

[5]GAO, *Cost Estimating and Assessment Guide: Best Practices for Developing and Managing Program Costs,* GAO-20-195G (Washington, D.C.: Mar. 12, 2020).

[6]The Federal Information Security Modernization Act of 2014, Pub. L. No. 113-283, 128 Stat. 3073 (Dec. 18, 2014) largely superseded the Federal Information Security Management Act of 2002, enacted as Title III, E-Government Act of 2002, Pub. L. No. 107-347, 116 Stat. 2899, 2946 (Dec. 17, 2002).

the Secretary of Education.[7] We also sent a letter on key issues related to financial management in the federal government to Education's Acting Chief Financial Officer.[8]

If you have any questions or would like to discuss any of the recommendations outlined in this letter, please do not hesitate to contact me at marinosn@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this letter. Our teams will continue to coordinate with your staff on addressing these 30 open recommendations that call for the attention of the CIO. I appreciate Education's continued commitment and thank you for your personal attention to these important recommendations.

Sincerely,

//SIGNED//

Nick Marinos
Managing Director
Information Technology and Cybersecurity

Enclosure

cc: Mr. Gregory Barbaccia, Federal CIO, Office of Management and Budget

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[7]GAO, *Priority Open Recommendations: Department of Education*, GAO-25-108002 (Washington, D.C.: May 06, 2025).

[8]GAO, *U.S. Consolidated Financial Statements: Key Issues for the Department of Education*, GAO-25-108149 (Washington, D.C.: July 23, 2025).

Enclosure

Chief Information Officer Open Recommendations to the Department of Education

This enclosure includes the open, publicly available GAO recommendations to the Department of Education (Education) that call for the attention of its Chief Information Officer (CIO). We have divided these recommendations into two categories: (1) ensuring the cybersecurity of the nation and (2) improving IT acquisitions and management.

Ensuring the Cybersecurity of the Nation

Federal agencies depend on IT systems to carry out operations and process, maintain, and report essential information. The security of these systems and data is vital to protecting individual privacy and ensuring national security. Table 1 provides information on the open cybersecurity-related recommendations relevant to the Education CIO.

Table 1: Open Chief Information Officer-related Cybersecurity Recommendations for the Department of Education (Education)

GAO report number	GAO report title	Recommendation
GAO-18-518	Cybersecurity: Office of Federal Student Aid Should Take Additional Steps to Oversee Non-School Partners' Protection of Borrower Information	The Secretary of Education should include specific security and privacy requirements in agreements with the Federal Family Education Loan Program lenders based on the Office of Federal Student Aid's categorization of the information shared with the lenders. (Recommendation 5)
		The Secretary of Education should develop policies and procedures to gain assurance that Federal Family Education Loan lenders have appropriate security and privacy controls in place and that these controls are being regularly tested and monitored. (Recommendation 6)
GAO-24-105658	Cybersecurity: Federal Agencies Made Progress, but Need to Fully Implement Incident Response Requirements	The Secretary of Education should ensure that the agency fully implements all event logging requirements as directed by Office of Management and Budget guidance. (Recommendation 3)

Source: GAO summary based on previously issued reports. | GAO-25-108659

Improving IT Acquisitions and Management

Federal IT investments too frequently fail to deliver capabilities in a timely, cost-effective manner. Key management challenges—such as a lack of disciplined project planning and program oversight—continue to hamper effective acquisition and management of the government's IT assets. Table 2 provides information on the open IT acquisition and management-related recommendations relevant to the Education CIO.

Table 2: Open Chief Information Officer (CIO)-related IT Acquisition and Management Recommendations for the Department of Education (Education)

GAO report number	GAO report title	Recommendation
GAO-23-105333	Information Technology: Education Needs to Address Student Aid Modernization Weaknesses	The Chief Operating Officer of the Office of Federal Student Aid (FSA) should ensure that, moving forward, the Next Gen program tracks and monitors all of its costs, including government labor costs. (Recommendation 1)

GAO report number	GAO report title	Recommendation
		The Chief Operating Officer of FSA should update FSA's cost estimation guidance for its acquisition programs to incorporate the best practices called for in the GAO *Cost Estimating and Assessment Guide*. (Recommendation 2)*
		The Chief Operating Officer of FSA should update the cost estimate for the Next Gen program to ensure it accounts for all costs and incorporates the best practices called for in the GAO *Cost Estimating and Assessment Guide*. (Recommendation 3)
		The Chief Operating Officer of FSA should revise the schedule estimate for the Next Gen FSA program to incorporate the best practices called for in the GAO *Schedule Assessment Guide*. (Recommendation 4)
		The Chief Operating Officer of FSA should ensure that the Partner Participation and Oversight (PPO) project defines metrics for tracking the baseline requirements and the rationale for using the metrics. (Recommendation 5)
		The Chief Operating Officer of FSA should ensure that the PPO project documents how detailed requirements meet the business need for the project. (Recommendation 6)
		The Chief Operating Officer of FSA should ensure that the PPO project captures work performance data and information to identify scope variances and their causes. (Recommendation 7)
		The Chief Operating Officer of FSA should ensure that the PPO project identifies success criteria and measurable project objectives. (Recommendation 8)
		The Chief Operating Officer of FSA should ensure that the PPO project updates the quality management section of its project management plan, and other related quality management documentation, to account for actual project results. (Recommendation 9)
		The Chief Operating Officer of FSA should ensure that the PPO project develops executable quality activities that incorporate FSA's quality policies into the project. (Recommendation 10)
		The Chief Operating Officer of FSA should ensure that the PPO project determines that contractor deliverables meet the terms of the contract prior to acceptance. (Recommendation 11)
		The Chief Operating Officer of FSA should ensure that the PPO project develops and maintains a stakeholder register that includes identification information or specifics around the level of engagement for each stakeholder. (Recommendation 12)
		The Chief Operating Officer of FSA should ensure that the PPO project defines specific strategies for engaging with stakeholders and updates its stakeholder engagement plan to reflect new or changed management strategies required to effectively engage stakeholders. (Recommendation 13)
		The Chief Operating Officer of FSA should ensure that the PPO project monitors work performance information that reflects the actual level of stakeholder support and

GAO report number	GAO report title	Recommendation
		engagement relative to the desired level during all phases of the project lifecycle. (Recommendation 14)
GAO-23-106376	Department of Education: Federal Student Aid System Modernization Project Should Better Estimate Cost and Schedule	The Secretary of Education should direct the Chief Operating Officer of FSA to ensure that the Award Eligibility Determination project develops a life cycle cost estimate and updates the budget based on this estimate. (Recommendation 1)
		The Secretary of Education should direct the Chief Operating Officer of FSA to ensure that the Award Eligibility Determination project documents its schedule assumptions and constraints. (Recommendation 2)
GAO-24-105980	Artificial Intelligence: Agencies Have Begun Implementation but Need to Complete Key Requirements	The Secretary of Education should ensure that the department develops a plan to either achieve consistency with Executive Order 13960 section 5 for each artificial intelligence application or retires artificial intelligence applications found to be developed or used in a manner that is not consistent with the order. (Recommendation 12)
GAO-24-106137	Cloud Computing: Agencies Need to Address Key OMB Procurement Requirements	The Secretary of Education should ensure that the CIO of Education updates guidance to put a cloud service level agreement in place with every vendor when a cloud solution is deployed. The guidance should include language that addresses the Office of Management and Budget's (OMB) required elements for service level agreements, including remediation plans for non-compliance. (Recommendation 7)
GAO-25-107041	IT Portfolio Management: OMB and Agencies Are Not Fully Addressing Selected Statutory Requirements	The Secretary of Education should direct the department CIO to work with OMB to ensure that annual reviews of their IT portfolio are conducted in conjunction with the Federal CIO, as prescribed by the Federal Information Technology Acquisition Reform Act. (Recommendation 14)
GAO-25-107179	Internet of Things: Federal Actions Needed to Address Legislative Requirements	The Secretary of Education should direct the CIO to complete the covered Internet of Things inventory within the revised time frame it has proposed. (Recommendation 2)
GAO-25-107396	Department of Education: Gaps in Federal Student Aid Contract Oversight and System Testing Need Immediate Attention	The Secretary of Education should direct the Chief Operating Officer of FSA to take steps to improve its contract monitoring process to provide assurance that the contractor performs the work called for in the contract for the Free Application for Federal Student Aid Processing System (FPS) and develops a clear record of accountability for performance. (Recommendation 1)
		The Secretary of Education should direct the Chief Operating Officer of FSA to establish a process to validate the contractor performance reports it receives. (Recommendation 2)
		The Secretary of Education should direct the Chief Operating Officer of FSA to establish a process to ensure that assessments of contractor performance are documented in accordance with departmental guidance. (Recommendation 3)
		The Secretary of Education should direct the Chief Operating Officer of FSA to take steps to ensure that all personnel performing program and project management

GAO report number	GAO report title	Recommendation
		activities and functions for the FPS contract obtain the appropriate Federal Acquisition Certifications. (Recommendation 4)
		The Secretary of Education should direct the Chief Operating Officer of FSA to take steps to establish a process to ensure that all personnel performing contract oversight roles and responsibilities are provided with training related to the project management framework of the contract they are overseeing prior to contract execution. (Recommendation 5)
		The Secretary of Education should direct the Chief Operating Officer of FSA to develop a standard or update its existing standard to include test case criteria for testing the FPS system that align with leading practices. (Recommendation 6)
		The Secretary of Education should direct the Chief Operating Officer of FSA to develop a plan for its beta testing efforts for future iterations of FPS. (Recommendation 7)

*Indicates a priority recommendation.