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Washington, DC 20548

August 28, 2025

Mr. Brian Epley  
Chief Information Officer  
U.S. Department of Commerce  
1401 Constitution Ave, NW  
Washington, DC 20230

### **Chief Information Officer Open Recommendations: Department of Commerce**

Dear Mr. Epley:

I am writing to you with respect to your role as the Chief Information Officer (CIO) for the Department of Commerce. 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 Commerce 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.<sup>1</sup> Your attention to these recommendations will help ensure the secure and effective use of IT at the department.

Currently, Commerce has 23 open recommendations that call for the attention of the CIO, including seven that are relevant to component-level CIOs. 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](#).<sup>2</sup> In addition, GAO has designated four of the 23 as priority recommendations.<sup>3</sup> Fully implementing these open recommendations could significantly

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<sup>1</sup>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).

<sup>2</sup>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).

<sup>3</sup>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.

improve Commerce's ability to deter threats and manage its critical systems, 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.** Commerce needs to take additional steps to secure the information systems it uses to carry out its mission. For example, we recommended that the department fully implement all event logging requirements as directed by the Office of Management and Budget. Implementing this recommendation will improve the department's ability to detect, investigate, and remediate cyber threats.

In addition, the National Telecommunications and Information Administration (NTIA) needs to fully address leading cybersecurity practices in modernizing its spectrum IT systems. In particular, we recommended that the agency develop a comprehensive, organizational risk assessment. Until it does so, NTIA is less able to identify and track progress in mitigating the cyber risks that are most impactful to the agency.

**Improving IT Acquisitions and Management.** Commerce needs to address challenges related to effectively acquiring and managing IT, including to improve its oversight of IT investments. For example, we recommended that Commerce complete annual reviews of its IT portfolio in conjunction with the Federal CIO. Until Commerce 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.

We also recommended that NTIA specify a time frame for developing a data governance plan that includes details on key procedures, roles, and responsibilities for the agency's new data standard. Until it does so, NTIA may face delays in fully implementing its new standard, and NTIA and its partners may face issues in exchanging and processing spectrum IT data.

In addition to GAO's recommendations, the Commerce 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.<sup>4</sup> It will be important to address both GAO and Inspector General 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 separate letters: (1) related to department-wide priority recommendations, to the Secretary of Commerce and (2) related to agencywide priority recommendations, to the Acting NTIA Administrator.<sup>5</sup>

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<sup>4</sup>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).

<sup>5</sup>GAO, *Priority Open Recommendations: Department of Commerce*, [GAO-25-108059](#) (Washington, D.C.: May 22, 2025); and *Priority Open Recommendations: National Telecommunications and Information Administration*, [GAO-25-108178](#) (Washington, D.C.: July 14, 2025).

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](mailto: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 23 open recommendations that call for the attention of the CIO. I appreciate Commerce'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. Alan Rosner, Acting CIO, National Telecommunications and Information Administration  
Ms. Deborah Stephens, Acting CIO, United States Patent and Trademark Office  
Mr. Michael Thieme, Acting CIO, Census Bureau  
Mr. Gregory Barbaccia, Federal CIO, Office of Management and Budget

## Enclosure

### Chief Information Officer Open Recommendations to the Department of Commerce

This enclosure includes the open, publicly available GAO recommendations to the Department of Commerce 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 Commerce CIO.

**Table 1: Open Chief Information Officer-related Cybersecurity Recommendations for Department of Commerce**

GAO report number	GAO report title	Recommendation
<a href="#">GAO-24-105658</a>	Cybersecurity: Federal Agencies Made Progress, but Need to Fully Implement Incident Response Requirements	The Secretary of Commerce should ensure that the agency fully implements all event logging requirements as directed by Office of Management and Budget (OMB) guidance. (Recommendation 2)
<a href="#">GAO-25-106795</a>	Cybersecurity Workforce: Departments Need to Fully Implement Key Practices	<p>The Secretary of Commerce should ensure that the Department of Commerce fully addresses the practices described in our report associated with conducting workforce analyses. (Recommendation 1)</p> <p>The Secretary of Commerce should ensure that the Department of Commerce fully addresses the practices described in our report associated with developing a workforce action plan. (Recommendation 2)</p> <p>The Secretary of Commerce should ensure that the Department of Commerce fully addresses the practices described in our report associated with implementing and monitoring a workforce action plan. (Recommendation 3)</p> <p>The Secretary of Commerce should ensure that the Department of Commerce fully addresses the practices described in our report associated with evaluating and revising a workforce action plan. (Recommendation 4)</p> <p>The Secretary of Commerce should ensure that the Department of Commerce identify and analyze the effectiveness of its mitigation actions on the cybersecurity workforce challenges. (Recommendation 5)</p>

GAO report number	GAO report title	Recommendation
<a href="#">GAO-25-107509</a>	Spectrum IT Modernization: NTIA Should Fully Incorporate Cybersecurity and Interoperability Practices	<p>The National Telecommunications and Information Administration (NTIA) Administrator should direct the IT Division in the Office of Policy Coordination and Management to work with the Office of Spectrum Management to develop an organizational risk management strategy that includes a determination of organizational risk tolerance, acceptable risk assessment methodologies, and details on strategies for responding to risks (such as risk acceptance, mitigation, or avoidance). (Recommendation 1)*</p> <p>The NTIA Administrator should direct the IT Division in the Office of Policy Coordination and Management to work with the Office of Spectrum Management to develop an organizational risk assessment that leverages aggregated information from system-level risk assessment results and risk considerations relevant at the organization level. (Recommendation 2)*</p> <p>The NTIA Administrator should direct the IT Division in the Office of Policy Coordination and Management to work with the Department of Commerce and the NTIA Office of Spectrum Management to ensure and document that system security plans for NTIA's spectrum IT systems are reviewed, at a minimum, annually, and include logs detailing the date of review and resulting changes. (Recommendation 3)</p> <p>The NTIA Administrator should direct the IT Division in the Office of Policy Coordination and Management to work with the Office of Spectrum Management to fully document identity, credential, and access management procedures for its cloud systems, including identification of authorized users and their roles, and associated access privileges, for each of its spectrum IT legacy systems. (Recommendation 4)*</p>

\*Indicates a priority recommendation.

Source: GAO summary based on previously issued reports. | GAO-25-108535

## 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 Commerce CIO.

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

GAO report number	GAO report title	Recommendation
<a href="#">GAO-15-431</a>	Telecommunications: Agencies Need Better Controls to Achieve Significant Savings on Mobile Devices and Services	<p>To help the department effectively manage spending on mobile devices and services, the Secretary of Commerce should ensure a reliable department-wide inventory of mobile service contracts is developed and maintained.</p> <p>To help the department effectively manage spending on mobile devices and services, the Secretary of Commerce should ensure procedures to monitor and</p>

GAO report number	GAO report title	Recommendation
		control spending are established department-wide. Specifically, ensure that (1) procedures include assessing devices for zero, under, and over usage; (2) personnel with authority and responsibility for performing the procedures are identified; and (3) the specific steps to be taken to perform the process are documented.
GAO-20-155	Telecommunications: Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce Risk of Costly Delays	<p>The Secretary of Commerce should ensure that the agency's CIO updates the telecommunications inventory to include all telecommunications assets and services in use at the agency, and updates Commerce's process for ongoing maintenance of the inventory to include the complete inventory. (Recommendation 1)</p> <p>The Secretary of Commerce should ensure that the agency's CIO completes efforts to identify future telecommunications needs using a complete inventory of existing telecommunications services; conducts and documents a comprehensive strategic analysis at all bureaus to identify areas for optimization and sharing of telecommunications resources; evaluates the costs and benefits of implementing new telecommunications technology and alternative options at all bureaus; and fully aligns Commerce's telecommunications needs with its long-term IT plans and enterprise architecture. (Recommendation 2)</p> <p>The Secretary of Commerce should ensure that the agency's CIO finalizes the responsibilities related to the information security management role during the telecommunications transition, and assigns the roles for providing legal expertise during the transition, as well as for managing human capital, telecommunications assets, and information security during the transition, to staff members; describes how changes and disruptions related to the transition will be communicated to end users at all bureaus and identifies the key local and regional agency transition officials responsible for disseminating information about the transition to employees and working with the vendor to facilitate transition activities in Commerce's transition communications plan; and establishes and implements configuration and change management processes for its transition. (Recommendation 3)</p> <p>The Secretary of Commerce should ensure that the agency's CIO identifies all of the funding needed to support the telecommunications transition; justifies requests for resources related to transition program management staff; conducts an analysis to identify staff resources needed for the entire transition effort; and analyzes training needs for staff assisting with the transition. (Recommendation 4)</p> <p>The Secretary of Commerce should ensure that the agency's CIO takes into account the agency's telecommunications transition risks, mission critical systems, and contingency plans in Commerce's transition timeline. (Recommendation 5)</p>

GAO report number	GAO report title	Recommendation
<a href="#">GAO-24-105979</a>	IT Modernization: Census Bureau Needs Reliable Cost and Schedule Estimates	The Secretary of Commerce should direct the Director of the Census Bureau to ensure that the Office of the CIO incorporates key elements, such as time frames, into its development, security, and operations strategy and finalizes it in a timely manner. (Recommendation 4)
<a href="#">GAO-24-105980</a>	Artificial Intelligence: Agencies Have Begun Implementation but Need to Complete Key Requirements	<p>The Secretary of Commerce should ensure that the department develops a plan to either achieve consistency with Executive Order 13960, section 5 for each artificial intelligence (AI) application or retires AI applications found to be developed or used in a manner that is not consistent with the order. (Recommendation 10)</p> <p>The Secretary of Commerce should ensure that the department updates its AI use case inventory to include all the required information, at minimum, and takes steps to ensure that the data in the inventory aligns with provided instructions. (Recommendation 11)</p>
<a href="#">GAO-24-106533</a>	Intellectual Property: Stronger Fraud Risk Management Could Improve the Integrity of the Trademark System	The Commissioner for Trademarks should identify and implement improvements to current data systems to strengthen trademark data analytics for stronger fraud risk management. (Recommendation 2)
<a href="#">GAO-25-107041</a>	IT Portfolio Management: OMB and Agencies Are Not Fully Addressing Selected Statutory Requirements	The Secretary of Commerce should direct the department CIO to work with the Office of Management and Budget to ensure that annual reviews of their IT portfolio are conducted in conjunction with the Federal CIO and the Chief Operating Officer or Deputy Secretary (or equivalent), as prescribed by the Federal Information Technology Acquisition Reform Act. (Recommendation 12)
<a href="#">GAO-25-107509</a>	Spectrum IT Modernization: NTIA Should Fully Incorporate Cybersecurity and Interoperability Practices	The National Telecommunications and Information Administration (NTIA) Administrator should direct the IT Division in the Office of Policy Coordination and Management to work with the Office of Spectrum Management to specify a time frame for developing a data governance plan that resolves conflicts related to the application of NTIA's new data standard and defines roles and responsibilities for making decisions regarding the standard. (Recommendation 5)*

\*Indicates a priority recommendation.

Source: GAO summary based on previously issued reports. | GAO-25-108535

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