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September 3, 2025

Mr. Clark Minor
Chief Information Officer
U.S. Department of Health and Human Services
200 Independence Ave., SW
Washington, DC 20201

Chief Information Officer Open Recommendations: Department of Health and Human Services

Dear Mr. Minor:

I am writing to you with respect to your role as the Chief Information Officer (CIO) for the Department of Health and Human Services (HHS). 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 GAO recommendations to HHS 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, HHS has 82 open recommendations, 37 of which are considered sensitive, that call for the attention of the CIO. Further, 49 of the 82 open recommendations are relevant to component-level CIOs. Each of the 82 recommendations relates to a GAO High-Risk area: (1) [Ensuring the Cybersecurity of the Nation](#) or (2) [Improving IT Acquisitions and Management](#).²

¹See 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).

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

In addition, GAO has designated one of the 82 as a priority recommendation.³ Fully implementing these open recommendations could significantly improve HHS'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, including sensitive but unclassified recommendations.

Ensuring the Cybersecurity of the Nation. HHS needs to take additional steps to secure the records and the information systems it uses to carry out its mission. For example, we recommended that HHS establish a reasonable time frame for when it will be able to digitally accept access and consent forms from individuals who were properly identity proofed and authenticated, and post those forms on the department's privacy program website. Until HHS implements this recommendation, the department will not be able to adequately protect records from improper disclosure.

We also recommended that the department fully implement all event logging requirements as directed by the Office of Management and Budget. Until HHS 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. HHS needs to better manage and track its IT resources. We recommended that HHS complete its covered Internet of Things (IoT) inventory within the revised time frame it had proposed.⁴ Given the enormous array of disparate devices that may be considered part of IoT, it is important that HHS identifies and documents the devices connected to its information systems. Until HHS implements this recommendation, the department will lack visibility into the IoT devices in its enterprise environment and the ability to mitigate IoT cybersecurity risks.

HHS also needs to develop a public health situational awareness and biosurveillance network. This includes ensuring that the lead operating division, in developing the Pandemic and All-Hazards Preparedness and Advancing Innovation Act of 2019 work plan, include specific actions that can be completed to show progress in developing the network. Implementing this recommendation will help ensure that HHS has the comprehensive capabilities needed to respond in a timely manner to infectious disease outbreaks like COVID-19.

In addition to GAO's recommendations, the HHS 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 2014.⁵ It will be important to address both GAO and Inspector General recommendations.

³Priority 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.

⁴Internet of Things generally refers to the technologies and devices that allow for the network connection and interaction of a wide array of devices that interact with the physical world, or "things", through such places as buildings, vehicles, transportation infrastructure, or homes.

⁵The 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).

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 the Secretary of HHS.⁶ We also sent a letter on key issues related to financial management in the federal government to HHS's Chief Financial Officer.⁷

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 82 open recommendations that call for the attention of the CIO. I appreciate HHS'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. Joe Henke, Acting Deputy Director/Deputy CIO, National Institutes of Health
Mr. Sridhar Mantha, Acting CIO, Food and Drug Administration
Mr. Mitchell Thornbrugh, CIO, Indian Health Service
Mr. Gregory Barbaccia, Federal CIO, Office of Management and Budget

⁶GAO, *Priority Open Recommendations: Department of Health and Human Services*, [GAO-25-108032](#) (Washington, D.C.: May 7, 2025).

⁷GAO, *U.S. Consolidated Financial Statements: Key Issues for the Department of Health and Human Services*, [GAO-25-108153](#) (Washington, D.C.: Aug. 21, 2025).

Enclosure

Chief Information Officer Open Recommendations to the Department of Health and Human Services

This enclosure includes the open GAO recommendations to the Department of Health and Human Services (HHS) that call for the attention of its Chief Information Officer (CIO), including the sensitive recommendations.⁸ 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 HHS CIO.

Table 1: Open Chief Information Officer-related Cybersecurity Recommendations for the Department of Health and Human Services (HHS)

GAO report number	GAO report title	Recommendation
GAO-20-598	Cybersecurity: DHS and Selected Agencies Need to Address Shortcomings in Implementation of Network Monitoring Program	The Director of the Indian Health Service should document approved hardware inventory information by associating Federal Information Security Modernization Act systems with the hardware on its network in a format that can be readily integrated into its continuous diagnostics and mitigation tools. (Recommendation 10) The Director of the Indian Health Service should configure its continuous diagnostics and mitigation tools to compare configuration settings against federal core benchmarks applicable to its environment. (Recommendation 12)
GAO-21-333SU	Cybersecurity: NIH Needs to Address Program and Control Deficiencies	Recommendation 88 Recommendation 143
GAO-23-105562	Information Management: Agencies Need to Streamline Electronic Services	The Secretary of HHS should establish a reasonable time frame for when HHS will be able to digitally accept access and consent forms from individuals who were properly identity proofed and authenticated and post access and consent forms on the department's privacy program website. (Recommendation 3)
GAO-24-105368SU	Cybersecurity: HHS Needs to Improve Incident Response Guidance, Implementation, and Oversight	Recommendations 1–6 Recommendation 8
GAO-24-105658	Cybersecurity: Federal Agencies Made Progress, but Need to Fully Implement Incident Response Requirements	The Secretary of HHS should ensure that the agency fully implements all event logging requirements as directed by Office of Management and Budget guidance. (Recommendation 5)

⁸Any GAO report number ending in SU (controlled unclassified information) contains a sensitive recommendation, the language of which will not be published in this enclosure. For further information please contact GAO for a copy of the full report.

GAO report number	GAO report title	Recommendation
GAO-24-106638	COVID-19: HHS Needs to Identify Duplicative Pandemic IT Systems and Implement Key Privacy Requirements	<p>The Secretary of HHS should ensure that the Administration for Strategic Preparedness and Response has an updated privacy impact assessment for the Cooperative Agreement Accountability and Management Platform. (Recommendation 5)</p> <p>The Secretary of HHS should ensure that the Administration for Strategic Preparedness and Response develops the authorization to operate for the Electronic Medical Records System. (Recommendation 8)</p> <p>The Secretary of HHS should ensure that the Director of the Centers for Disease Control and Prevention conducts and develops privacy impact assessments for all pandemic public health preparedness and response systems that include personally identifiable information. (Recommendation 9)</p> <p>The Secretary of HHS should ensure that the Director of the Centers for Disease Control and Prevention ensures that the senior official for privacy reviews and approves the system security categorizations for the COVID-19 Clearinghouse and HHS Protect. (Recommendation 10)</p>
GAO-25-106405SU	Cybersecurity: NIH Needs to Improve Access Controls and Logging for Key Systems	<p>Recommendations 1 and 2</p> <p>Recommendations 4–28</p>

Source: GAO summary based on previously issued reports. | GAO-25-108539

Note: Due to the sensitive nature of GAO reports with report numbers ending in SU (controlled unclassified information), the recommendation language has been omitted.

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 HHS CIO.

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

GAO report number	GAO report title	Recommendation
GAO-17-377	Public Health Information Technology: HHS Has Made Little Progress toward Implementing Enhanced Situational Awareness Network Capabilities	<p>To ensure progress is made toward the implementation of any IT enhancements needed to establish electronic public health situational awareness network capabilities mandated by the Pandemic and All-Hazards Preparedness Reauthorization Act of 2013 (PAHPRA), the Secretary of HHS should direct the Assistant Secretary for Preparedness and Response (ASPR) to task an integrated project team, made up of an IT project manager and business owner, with including specific actions in the Public Health and Medical Situational Awareness Strategy Implementation Plan for conducting all activities required to establish and operate the network. (Recommendation 1)</p> <p>To ensure progress is made toward the implementation of any IT enhancements needed to establish electronic public health situational awareness network capabilities</p>

GAO report number	GAO report title	Recommendation
		<p>mandated by PAHPRA, the Secretary of HHS should direct ASPR to task the integrated project team with developing a project management plan that includes measurable steps--including a timeline of tasks, resource requirements, estimates of costs, and performance metrics--that can be used to guide and monitor HHS's actions to establish the network defined in the plans. (Recommendation 2)</p> <p>To ensure progress is made toward the implementation of any IT enhancements needed to establish electronic public health situational awareness network capabilities mandated by PAHPRA, the Secretary of HHS should direct ASPR to conduct all IT management and oversight processes related to the establishment of the network in accordance with <i>Enterprise Performance Life Cycle Framework</i> guidance, under the leadership of the HHS CIO. (Recommendation 3)</p>
GAO-19-49	Information Technology: Departments Need to Improve Chief Information Officers' Review and Approval of IT Budgets	<p>The Secretary of HHS should ensure that the Office of the CIO and other offices, as appropriate, address gaps in the department's Federal Information Technology Acquisition Reform Act (FITARA) plans by developing and implementing policies and procedures that include the CIO as a member of governance boards that inform decisions regarding all IT resources, including component-level boards. (Recommendation 18)</p> <p>The Secretary of HHS should ensure that the Office of the CIO and other offices, as appropriate, address gaps in the department's FITARA plans by developing and implementing policies and procedures that document the steps the CIO is to take to ensure whether the IT portfolio includes appropriate estimates of all IT resources included in the budget request. (Recommendation 22)</p>
GAO-20-155	Telecommunications: Agencies Should Fully Implement Established Transition Planning Practices to Help Reduce Risk of Costly Delays	<p>The Secretary of HHS should ensure that the agency's CIO develops a policy that requires the agency's components to maintain an inventory of the telecommunications assets and services that they acquire independently from headquarters; updates the telecommunications inventory to include all telecommunications assets and services in use at HHS, and updates the agency's process for ongoing maintenance of the inventory to include the complete inventory. (Recommendation 6)</p> <p>The Secretary of HHS should ensure that the agency's CIO completes efforts to identify future telecommunications needs using a complete inventory of existing telecommunications services; and aligns HHS's telecommunications needs with its long-term IT plans. (Recommendation 7)</p>
GAO-22-104600	COVID-19: Pandemic Lessons Highlight Need for Public Health Situational Awareness Network	<p>The Secretary of HHS should prioritize the development of the public health situational awareness and biosurveillance network by designating a lead operational division for Pandemic and All-Hazards Preparedness and Advancing Innovation Act of 2019 (PAHPAIA) implementation. (Recommendation 1)</p> <p>The Secretary of HHS should clearly define the roles and responsibilities for the lead operational division</p>

GAO report number	GAO report title	Recommendation
		<p>responsible for PAHPAIA implementation. The roles and responsibilities should include the specific activities required in PAHPAIA. (Recommendation 2)</p> <p>The Secretary of HHS should identify the office responsible for overseeing the completion of the activities performed by the lead operational division and clearly define its roles and responsibilities. (Recommendation 3)</p> <p>The Secretary of HHS should ensure that the lead operational division, in developing the PAHPAIA work plan, includes the steps to be taken to address all of the required actions in PAHPAIA. (Recommendation 4)</p> <p>The Secretary of HHS should ensure that the lead operational division, in developing the PAHPAIA work plan, includes specific near-term and long-term actions that can be completed to show progress in developing the network. (Recommendation 5)*</p> <p>The Secretary of HHS should ensure that the lead operational division, in developing the PAHPAIA work plan, includes time frames for implementing the near-term and long-term actions. (Recommendation 6)</p> <p>The Secretary of HHS should ensure that the PAHPAIA work plan includes specific steps the department will take to oversee the progress of the actions the lead operational division takes to implement PAHPAIA requirements. (Recommendation 7)</p> <p>The Secretary of HHS should commit to a deadline for finalizing the work plan to implement PAHPAIA requirements and ensure that the work plan is fully implemented. (Recommendation 8)</p> <p>The Secretary of HHS should ensure that the lead operational division for PAHPAIA implementation identifies and documents the IT and information sharing-related challenges and lessons learned from the COVID-19 pandemic. (Recommendation 9)</p> <p>The Secretary of HHS should ensure that the lead operational division for PAHPAIA implementation shares the lessons learned from the COVID-19 pandemic with relevant stakeholders, such as state, territorial, and local public health officials. (Recommendation 10)</p> <p>The Secretary of HHS should ensure that the lead operational division for PAHPAIA implementation request that state, territory, and local public health officials share their lessons learned from the COVID-19 pandemic with HHS. (Recommendation 11)</p> <p>The Secretary of HHS should ensure that the lead operational division for PAHPAIA implementation incorporates lessons learned from the COVID- 19 pandemic into its plans for implementing the situational awareness and biosurveillance network. (Recommendation 12)</p>
GAO-22-105018	Contact Tracing for Air Travel: CDC's Data System Needs Substantial Improvement	The Director of the Centers for Disease Control and Prevention (CDC) should implement controls for the entry of data into its Quarantine Activity Reporting

GAO report number	GAO report title	Recommendation
		<p>System, including by providing adequate training and standard operating procedures that are documented and institutionalized for system users and by conducting consistent validation checks. (Recommendation 1)</p> <p>The Director of CDC should assess additional opportunities to improve the quality of air passenger information it collects and manages—including opportunities to increase automation by adopting or establishing data exchange standards—and take action, as appropriate, based on this assessment. (Recommendation 2)</p> <p>The Director of CDC should re-design the Quarantine Activity Reporting System or deploy a new data system that would allow CDC to more effectively facilitate contact tracing for air passengers and conduct disease surveillance for air travel. (Recommendation 3)</p>
GAO-24-105980	Artificial Intelligence: Agencies Have Begun Implementation but Need to Complete Key Requirements	<p>The Secretary of HHS 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 retire AI applications found to be developed or used in a manner that is not consistent with the order. (Recommendation 14)</p> <p>The Secretary of HHS 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 15)</p>
GAO-24-106638	COVID-19: HHS Needs to Identify Duplicative Pandemic IT Systems and Implement Key Privacy Requirements	<p>The Secretary of HHS should ensure that the HHS CIO develops and maintains a department-wide comprehensive list of systems, including component systems, that support pandemic public health preparedness and response. (Recommendation 1)</p> <p>The Secretary of HHS should ensure that the HHS CIO conducts reviews of systems that support pandemic public health preparedness and response across the department to identify and reduce any unnecessary duplication, overlap, or fragmentation and identify mitigation options, such as consolidation or elimination of systems. The HHS CIO should share the results of its reviews with components when identifying any instances of unnecessary duplication, overlap, or fragmentation. (Recommendation 2)</p> <p>The Secretary of HHS should ensure that component agencies proactively and consistently identify and track the funding sources and costs dedicated to operating and maintaining all of their systems supporting pandemic public health preparedness and response. (Recommendation 3)</p> <p>The Secretary of HHS should ensure that component agencies proactively and consistently identify and track staffing resources, including the type and number of staff dedicated to managing all of their systems supporting pandemic public health preparedness and response. (Recommendation 4)</p>

GAO report number	GAO report title	Recommendation
GAO-25-106795	Cybersecurity Workforce: Departments Need to Fully Implement Key Practices	<p>The Secretary of HHS should ensure that HHS fully addresses the practices described in our report associated with setting the strategic direction for the cybersecurity workforce. (Recommendation 8)</p> <p>The Secretary of HHS should ensure that HHS fully addresses the practices described in our report associated with conducting workforce analyses. (Recommendation 9)</p> <p>The Secretary of HHS should ensure that HHS fully addresses the practices described in our report associated with developing a workforce action plan. (Recommendation 10)</p> <p>The Secretary of HHS should ensure that HHS fully addresses the practices described in our report associated with implementing and monitoring a workforce action plan. (Recommendation 11)</p> <p>The Secretary of HHS should ensure that HHS fully addresses the practices described in our report associated with evaluating and revising a workforce action plan. (Recommendation 12)</p> <p>The Secretary of HHS should ensure that HHS identify and analyze the effectiveness of its mitigation actions on the cybersecurity workforce challenges. (Recommendation 13)</p>
GAO-25-107041	IT Portfolio Management: OMB and Agencies Are Not Fully Addressing Selected Statutory Requirements	The Secretary of HHS should direct the department CIO to work with the Office of Management and Budget (OMB) 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 FITARA. (Recommendation 16)
GAO-25-107179	Internet of Things: Federal Actions Needed to Address Legislative Requirements	<p>The Secretary of HHS should direct the CIO to complete the covered Internet of Things inventory within the revised time frame it has proposed. (Recommendation 3)</p> <p>The Secretary of HHS should direct the CIO to ensure that granted Internet of Things waivers address OMB's requirements. (Recommendation 11)</p>
GAO-25-107289SU	Information Technology: Agencies Need to Plan for Modernizing Critical Decades-Old Legacy Systems	Recommendation 5

*Indicates a priority recommendation.

Source: GAO summary based on previously issued reports. | GAO-25-108539

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