

All redacted information exempt under b(1) and/or b(3) except where otherwise noted.

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OFFICE OF INSPECTOR GENERAL  
NATIONAL SECURITY AGENCY  
CENTRAL SECURITY SERVICE

[REDACTED]

TO: (U) DISTRIBUTION.

SUBJECT: ~~(TS//SI//NF)~~ Audit of NSA Controls to Comply with the Foreign Intelligence Surveillance Court Order Regarding Pen Register and Trap and Trace Devices [REDACTED]  
- ACTION MEMORANDUM

1. ~~(TS//SI//NF)~~ This is our formal announcement that the Office of the Inspector General (OIG) will conduct an audit to test the effectiveness of NSA controls to ensure compliance with the Foreign Intelligence Surveillance court order regarding pen register and trap and trace (PR/TT) devices.

2. ~~(TS//SI//NF)~~ The objective of this review is to test whether controls to ensure NSA compliance with key terms of the PR/TT Order are operating as intended. The Order also requires the OIG to coordinate periodically with the Department of Justice's National Security Division on their respective oversight responsibilities and NSA compliance with the Court's order. We will start the on-site segment of the review with an entrance conference in [REDACTED] to explain our review process. At that time, please provide a detailed briefing on the controls in place and the information contained in the PR/TT audit logs. Please designate points of contact from [REDACTED]

3. ~~(U//FOUO)~~ The OIG team members are Assistant Inspectors General [REDACTED]. Your cooperation and assistance are greatly appreciated. Please address any questions concerning the review to [REDACTED] at [REDACTED]

[REDACTED]

Derived From: NSA/CSSM 1-52  
Dated: 20070108  
Declassify On: [REDACTED]

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cc: SID Director

NSA/CSS Director of Compliance, [REDACTED]  
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~~(TS//SI//NF)~~ Audit of NSA Controls to Comply with the FISC Order Regarding PR/TT Devices [REDACTED]

(U) Announcement letter [REDACTED]

(U) Audit Objective

- ~~(TS//SI//NF)~~ To test whether controls to ensure NSA's compliance with key terms of the PR/TT Order are operating as intended.
  - (U) Controls are the mechanisms in place to ensure compliance.
  - (U) Controls are generally either preventive or detective.
  - (U) Controls include monitoring by management.

(U) Technique chosen – "continuous auditing"

- (U) One of many tools used within the internal audit profession to provide reasonable assurance that the control structure surrounding the operational environment is:
  - suitably designed,
  - established, and
  - operating as intended.
- (U) Tests transactions or key control points based on predetermined criteria and identifies anomalies.
- (U) Changes the audit paradigm from periodic reviews of a sample of transactions to ongoing audit testing of all transactions.
- (U) Used in conjunction with management's monitoring.

(U) Audit goals:

- (U) Automate test procedures when possible.
- (U) Minimize support needed from operational personnel.
- (U) Use statistically valid sampling methodologies when sampling is required.
- (U) Complement, not duplicate, monitoring conducted by management.
- (U) Coordinate with NSD, DoJ.

(U) Significant planning process required:

- (U) Develop detailed test procedures.
- (U) Run pilot tests.

~~(TS//SI//NF)~~ The audit suspended on [REDACTED] when the order was not renewed. The background work is applicable to Business Records order as well. The continuous auditing technique is now being applied to the BR order.

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Declassify On: [REDACTED]

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