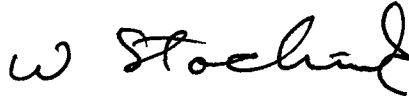# INVESTIGATIVE MEMORANDUM ON MANAGEMENT ISSUES (G-442/433)

November 13, 2006

To: Diego T. Ruiz

From: Walter Stachnik

Re: Name Relationship Search Index (NRSI) Training and Warning

During two investigations recently conducted by our office (OIG-442 and 433), we found evidence that an employee had used the Name Relationship Search Index (NRSI)[1] for personal purposes and another employee had shared his NRSI user password with other employees. These two employees, who work in different offices, told us they received little or no training on NRSI (NRSI) when they were given access to that database. One of these employees also indicated that the NRSI training he did receive, which occurred over a year after he joined the Commission, focused on how to perform NRSI searches, not on permissible uses of the database. The other employee said he was unaware that NRSI passwords could not be shared with other employees.

The warning on the NRSI login screen does not inform employees that the database is to be used only for official purposes. The warning does instruct employees not to share their user ids or passwords with anyone and not to distribute NRSI information to any unauthorized individuals.

To prevent improper use of NRSI, training on the system should be improved and provided to employees before they are given NRSI access. Also, the warning on the login screen should state that NRSI is only for official use.

Recommendation A

The Office of the Executive Director (OED),[2] in consultation with the Division of Enforcement (Enforcement), the Office of Information Technology (OIT) and other user divisions and offices, should require that all agency employees receive training on NRSI before being granted access to the database. This training

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[1] The NRSI application provides a cross-reference of data by name that is contained in multiple internal and external automated SEC systems. It enables agency staff to cross-reference information available in these systems by entering a partial or full name of an individual or company. All of the information in NRSI is not for public release.

[2] According to the NRSI User Guide (Version 1.0, Oct. 10. 2003), the OED is the NRSI system owner.

should include a discussion of the non-public nature of the database, the permissible uses of the database, and the prohibition on sharing NRSI user passwords.

Recommendation B

The OED, in consultation with Enforcement, OIT, the Office of General Counsel, and other user divisions and offices, should add a statement to the warning on the NRSI login screen that NRSI is to be used only for official purposes.

Management Response

The OED agrees with Recommendations A and B. While the OED indicated that resources are too limited to provide in-person training to every new NRSI user, the OED believes that updating and distributing a training CD to new users would be an appropriate remedy. The OED will work with Enforcement and OIT to refine and implement the strategy for training new users, including a clear discussion of permissible and non-permissible uses of the database. The OED will also work with OIT to revise the current NRSI warning statement to clarify that the system is for official use only.

cc: Corey Booth
Joseph Gerrity
Kenneth Johnson
Debra Kittredge
Randall Lee
Shelley Parratt
Linda Thomsen
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