MEMORANDUM

SUBJECT: Response to Office of Inspector General Final Report No. 19-F-0003 "*EPA's Fiscal Years 2018 and 2017 Consolidated Financial Statements*" dated November 14, 2018

FROM: Donna J. Vizian, Principal Deputy Assistant Administrator//signed//

Vaughn Noga, Deputy Assistant Administrator for Environmental Information and Chief Information Officer//signed//

TO: Paul C. Curtis, Director
Financial Audits
Office of Audit and Evaluation

Thank you for the opportunity to respond to the issues and recommendations in the subject audit report. The agency agrees with many of the recommendations in the final report with the exception of one. For each report recommendation that we agree with we have provided high-level intended corrective actions and estimated completion dates. For the recommendation that we disagree with we have shared our rationale and a proposed alternative.

No.	Recommendation	High-Level Intended Corrective Action(s)	Estimated Completion by Quarter and FY
10	We recommend that the Deputy Assistant Administrator for Environmental Information and Chief Information Officer develop and implement controls to remove an individual's PIV card access rights to computer rooms with financial and mixed-financial applications	OMS will review and update the processes to ensure that appropriate PIV card access rights are removed when that individual no longer needs access. An individual's PIV card access rights are removed when OMS is notified that an individual no longer requires access as determined by the individual's supervisor. Currently, on a quarterly basis, an access report is	September 30, 2019

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	when that individual no longer requires access.	generated by the Contractor Security staff and emailed to the appropriate facility manager. Supervising officials of the persons that have access to the data center are then notified to recertify/approve the individuals under their purview within a two-week timeframe. Individuals whose supervisors provide recertification approval continue to maintain access, otherwise access is revoked.	
11	We recommend that the Deputy Assistant Administrator for Environmental Information and Chief Information Officer as required by EPA's Information Security – Interim Physical and Environmental Protection Procedures v1.9 (CIO-2150.3-P-11.1), dated August 6, 2012, perform quarterly reviews of access to computer rooms with financial and mixed-financial applications, to determine whether individuals require physical access to the equipment in the computer room to complete their job responsibilities.	OMS will review and update the quarterly review process for access to computer rooms with financial and mixed-financial applications. An individual's PIV card access rights are removed when OMS is notified that an individual no longer requires access as determined by the individual's supervisor. Currently, on a quarterly basis, an access report is generated by the contractor security staff and emailed to the appropriate facility manager. Supervising officials of the persons that have access to the data center are then notified to recertify/approve the individuals under their purview within a two-week timeframe. Individuals whose supervisors provide recertification approval continue to maintain access, otherwise access is revoked.	September 30, 2019

No.	Recommendation	High-Level Intended Corrective Action(s)	Estimated Completion by Quarter and FY
12	We recommend that the Deputy Assistant Administrator for Environmental Information and Chief Information Officer implement a process to provide access to and monitor individuals who occasionally need access to a computer room with financial and mixed-financial applications but not to the computer equipment.	OMS will review the processes to monitor individuals who need occasional access to the computer room but not to the computer equipment to identify potential improvements and corrective actions.	Completed
13	We recommend that the Deputy Assistant Administrator for Environmental Information and Chief Information Officer maintain an inventory of all Personal Identity Verification cards with access to computer rooms with financial and mixed-financial applications that are not assigned to individuals and remove access when cards are discovered missing.	OMS will review and integrate the process to maintain visitor badges that are not specifically assigned to an individual. Unassigned PIV cards are issued for no more than 24 hours unless special permission is provided. Identification is retained at the time the unassigned PIV card is signed out.	Completed
14	We recommend that the Deputy Assistant Administrator for Environmental Information and Chief Information Officer implement controls to enforce the required verification of individuals identity prior to allowing their access to computer rooms with financial	Updates to badge readers are anticipated in the future, though a specific timeframe has not been established. OMS will review this requirement as it relates to the new badge readers. In the interim, the computer room referenced in this report is not a standalone facility, it is a controlled room within a controlled	March 31, 2020

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	and mixed-financial applications.	building. Physical security is multi-layered for access to the campus, starting with the exterior, then within buildings, then within rooms. The individual's identity is verified physically by visual inspection of a federal ID at RTP Campus gates; by PIV swipe and guard verification that the face matches the picture that shows up on their monitor; by PIV access to elevator to computer room floor; and finally, by PIV at computer room entrance. This is an accepted physical security practice in accordance with Federal standards.	

Disagreements

No.	Recommendation	Agency Explanation/Response	Proposed Alternative
15	We recommend that the Deputy Assistant Administrator for Administration for Resources Management perform a review of system requirements and evaluate the suitability of existing technology to replace or implement updates to the computer room's surveillance system and generators. Update or replace, if warranted, the equipment	OMS will need to work through the agency's budget planning process to have funds allocated and available for this purpose.	We recommend that the Principal Deputy Assistant Administrator for the Office of Mission Support direct a review of system requirements and evaluate the suitability of existing technology to replace or implement updates to the computer room's surveillance system

based on the results of the evaluation.		and generators. As a result of the review, updates or replacements can be made when resources become available.

CONTACT INFORMATION

If you have any questions regarding this response, please contact the OMS audit follow-up coordinator, Marilyn Armstrong, at 202-564-1876.

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