



U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL

Operating efficiently and effectively

Management Alert:
**EPA Still Unable to Validate
that Contractors Received
Role-Based Training for
Information Security Protection**

Report No. 20-P-0007

October 21, 2019



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Abbreviations

| | |
|-------|---|
| CIO | Chief Information Officer |
| COR | Contracting Officer's Representative |
| EPA | U.S. Environmental Protection Agency |
| EPAAG | Environmental Protection Agency Acquisition Guide |
| FY | Fiscal Year |
| ISO | Information Security Officer |
| IT | Information Technology |
| OIG | Office of Inspector General |
| RBT | Role-Based Training |

Cover Image: Only 33 percent (seven of 21) of EPA offices submitted a complete response by September 30, 2018, certifying that contractors completed the required RBT. (EPA OIG image)

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At a Glance

Why We Did This Project

The Office of Inspector General (OIG) for the U.S. Environmental Protection Agency (EPA) conducted this follow-up audit to determine whether the EPA completed actions for Recommendation 3 in prior OIG Report No. [17-P-0344](#). The recommendation required the EPA to maintain a list of contractors required to take role-based training (RBT) and validate that all contractors have completed RBT. We further sought to determine (1) whether EPA offices' fiscal year 2018 certifications were accurate and (2) what additional steps are needed to verify contractors' completion of RBT.

RBT is continuous education that improves current knowledge, skills and abilities for a particular job function.

This report addresses the following:

- *Operating efficiently and effectively.*

Address inquiries to our public affairs office at (202) 566-2391 or OIG_WEBCOMMENTS@epa.gov.

List of [OIG reports](#).

Management Alert: EPA Still Unable to Validate that Contractors Received Role-Based Training for Information Security Protection

What We Found

The EPA continues to lack information to monitor compliance with the following RBT requirements:

- Confirming that contractor personnel completed the required RBT.
- Including RBT provisions in existing information technology services contracts.
- Maintaining a list of contractor personnel required to complete RBT.

The EPA has limited assurance that contractor personnel are maintaining skills needed to combat efforts to destroy, steal or hold for ransom the EPA's systems and sensitive information.

These weaknesses occurred because:

- Most EPA offices did not validate that all contractors completed the required RBT.
- EPA Contracting Officer's Representatives were unfamiliar with RBT requirements.
- The EPA's directives did not explicitly designate who is responsible for maintaining a list of contractors required to complete RBT.

As a result, only seven of 21 (33 percent) EPA offices submitted a complete response by September 30, 2018, to the EPA's Chief Information Security Officer certifying that contractors completed the required RBT. We are issuing this management alert on these weaknesses because immediate improvements are needed to verify that contractors are trained in their roles to protect agency systems and data.

Recommendations and Planned Agency Corrective Actions

We recommend the Assistant Administrator for Mission Support (1) validate that all EPA offices submit the annual RBT certifications, (2) train EPA Contracting Officer's Representatives on mandatory RBT requirements, (3) implement a plan to identify which existing information technology services contracts should include RBT requirements, and (4) require EPA offices to maintain a list of contractor personnel required to complete RBT. The EPA completed corrective actions for Recommendations 1 and 4. The agency agreed to Recommendations 2 and 3 but has not provided corrective actions or milestone dates. Recommendations 2 and 3 are therefore unresolved.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
INSPECTOR GENERAL

October 21, 2019

MEMORANDUM

SUBJECT: Management Alert: EPA Still Unable to Validate that Contractors Received Role-Based Training for Information Security Protection
Report No. 20-P-0007

FROM: Charles J. Sheehan, Acting Inspector General

A handwritten signature in blue ink that reads "Charles J. Sheehan".

TO: Donna Vizian, Principal Deputy Assistant Administrator
Office of Mission Support

This is our report on the subject audit conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). The project number for this audit was OA&E-FY19-0103. This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final EPA position. Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

We issued a discussion document presenting our audit results to the EPA on June 3, 2019, for its review. In addition, we met with the EPA on July 8, 2019, to discuss our audit results. The EPA did not provide a formal written response to the discussion document. However, we summarized management's verbal response to the report's findings and recommendations. The EPA concurred with our audit results and with issuing this management alert as a final report on an expedited schedule.

Within the Office of Mission Support, the Office of Information Security and Privacy and the Office of Acquisition Solutions are responsible for the issues discussed in this report.

The Office of Mission Support provided acceptable evidence to support that corrective actions were completed in response to Recommendations 1 and 4, and no further response is required for these recommendations.

Action Required

The Office of Mission Support did not provide planned corrective actions or milestone dates for Recommendations 2 and 3. Therefore, Recommendations 2 and 3 are unresolved. In accordance with EPA Manual 2750, you are required to provide a written response for these recommendations within 60 calendar days. You should include planned corrective actions and completion dates for all recommendations that need additional information for resolution. Your response will be posted on the OIG's website, along with our memorandum commenting on your response. Your response should be

provided as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that you do not want to be released to the public; if your response contains such data, you should identify the data for redaction or removal along with corresponding justification.

We will post this report to our website at www.epa.gov/oig.

Table of Contents

| | |
|--|----|
| Purpose..... | 1 |
| Background..... | 1 |
| Responsible Offices..... | 3 |
| Scope and Methodology..... | 3 |
| Prior Audit Work..... | 4 |
| Results..... | 4 |
| Conclusion..... | 8 |
| Recommendations..... | 8 |
| Agency Response and OIG Evaluation..... | 8 |
| Status of Recommendations and Potential Monetary Benefits..... | 10 |

Appendices

| | | |
|---|---|----|
| A | Status of Corrective Actions on Prior OIG Report Recommendations..... | 11 |
| B | Distribution..... | 12 |

Purpose

The Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA) conducted this follow-up audit to determine whether the EPA completed corrective actions for Recommendation 3 in EPA OIG Report No. [17-P-0344](#), *EPA Lacks Processes to Validate Whether Contractors Receive Specialized Role-Based Training for Network and Data Protection*, issued July 31, 2017.

Recommendation 3 required the EPA to implement a process to require agency personnel to maintain a list of contractors who have significant information security responsibilities and are required to take role-based training (RBT). Additionally, the recommendation required agency personnel to validate and report to the EPA’s Chief Information Security Officer (ISO) that all contractors have completed required RBT. We also sought to determine:

RBT is role-specific training for an individual based on the person’s functional job and responsibilities; through continuous education, the person’s knowledge, skills and abilities are enhanced.

- Whether fiscal year (FY) 2018 certifications provided to the EPA’s Chief ISO were complete, accurate and supported by records maintained by the respective EPA offices.
- What additional steps the EPA needs to take to verify that agency contractors complete the required, specialized RBT.

Background

As of September 30, 2018, the EPA planned to spend \$209.6 million for information technology (IT) services contracts. These contracts provide IT operations and maintenance support services for the EPA’s program and regional offices (Table 1).

Table 1: EPA program offices and regions

| 11 program offices | 10 regions (location) |
|--|--------------------------|
| Office of Air and Radiation | Region 1 (Boston) |
| Office of Chemical Safety and Pollution Prevention | Region 2 (New York) |
| Office of the Chief Financial Officer | Region 3 (Philadelphia) |
| Office of Enforcement and Compliance Assurance | Region 4 (Atlanta) |
| Office of General Counsel | Region 5 (Chicago) |
| Office of Inspector General | Region 6 (Dallas) |
| Office of International and Tribal Affairs | Region 7 (Kansas City) |
| Office of Land and Emergency Management | Region 8 (Denver) |
| Office of Mission Support | Region 9 (San Francisco) |
| Office of Research and Development | Region 10 (Seattle) |
| Office of Water | |

Source: EPA website.

The contracted IT support functions include network infrastructure, database administration, computer/network system security, application development and website management. System administrators, network administrators and system architects are examples of roles that EPA contractors perform that have significant information security responsibilities. These roles allow the contractor to update information security controls to protect EPA systems and data from fraud, waste and abuse. As such, these contractors must complete specialized RBT as required by information security directives.

The EPA Chief Information Officer's (CIO's) Information Directive No. CIO 2150.4, *Information Security Policy*, approved December 28, 2016, says that the EPA Information Security Program shall include "[m]andatory role-based information security training for personnel designated as having significant information security responsibilities to carry out their information security responsibilities." Similarly, the EPA's Information Directive No. CIO 2150-P-02.2, *Information Security – Awareness and Training Procedures*, approved February 16, 2016, requires that the EPA must "[d]evelop and maintain role based training, education and credentialing requirements to ensure EPA employees and contractors designated as having significant information security responsibilities receive adequate training with respect to such responsibilities." CIO 2150-P-02.2 also requires adherence to the National Institute of Standards and Technology Special Publication 800-53 Revision 4, *Security and Privacy Controls for Federal Information Systems and Organizations*, which establishes procedures and guidelines for RBT.

The EPA also took steps to require program and regional offices to include these training requirements in new contractual agreements. In December 2016, the EPA issued Interim Policy Notice 17-01, *Use of 22 Cybersecurity Tasks*. This notice directed the Office of Environmental Information (now part of the Office of Mission Support), as the agency's cybersecurity technical experts, to (1) identify cybersecurity tasks, to include RBT for contractors, as necessary in both new contracts and new work starting under existing contracts and (2) coordinate with the EPA's acquisition management office to modify or amend solicitations and contracts to include cybersecurity tasks.

In April 2018, Environmental Protection Agency Acquisition Guide (EPAAG), subsection 39.1.2, "Cybersecurity Tasks," was issued to finalize Interim Policy Notice 17-01. EPAAG 39.1.2 provides that Contracting Officer's Representatives (CORs) should work with the Office of Environmental Information to determine whether any cybersecurity tasks must be "added or included" to the COR's contractual documents.

Further, on August 15, 2018, the EPA issued a memorandum, *Certification of Information Security Role-Based Training for Contractor Staff*, that requires all Senior Information Officials to provide written certification—to be submitted to

the agency’s Chief ISO by September 30 of each year—that EPA contractors with information security duties have completed the necessary RBT specific to their contract roles.

Responsible Offices

Within the EPA’s Office of Mission Support, the Office of Acquisition Solutions is responsible for planning, awarding and administering contracts. The Office of Information Security and Privacy, also within the Office of Mission Support, handles information security oversight and compliance with RBT requirements.

Scope and Methodology

We performed this performance audit from February 2019 through August 2019 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. The evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We performed the following activities:

- Selected a judgmental sample of 15 IT services contracts to determine whether RBT requirements were included, as required by EPA information security directives.
- Obtained training certificates for a sample of contractors to determine whether contractors completed RBT requirements by September 30, 2018.
- Interviewed EPA ISOs and CORs to obtain an understanding of the agency’s processes for tracking and reporting the status of RBT for agency contractors with significant information security responsibilities.
- Obtained the FY 2018 certifications to determine whether all EPA offices submitted the required information to the EPA’s Chief ISO by September 30, 2018.
- Interviewed EPA management to determine whether corrective actions have been implemented to maintain a list of contractors required to take RBT and whether management validated that all contractors have completed RBT requirements.

ISOs determine whether contractor training meets the EPA’s RBT requirements.

Prior Audit Work

The EPA OIG issued Report No. [17-P-0344](#), *EPA Lacks Processes to Validate Whether Contractors Receive Specialized Role-Based Training for Network and Data Protection*, on July 31, 2017. This prior report noted that the EPA had not implemented an oversight process to track and report contractor compliance with RBT. See Appendix A for the status of the EPA's corrective actions in response to this prior report's recommendations.

Results

The EPA continues to lack internal controls to monitor contractor compliance with completing mandatory training requirements. Office of Management and Budget Circular A-123, *Management's Responsibility for Enterprise Risk Management and Internal Control*, states that management is "responsible for establishing and maintaining internal controls to achieve specific internal control objectives related to operations, reporting, and compliance." In this regard, management is responsible for establishing internal controls to comply with federal requirements that provide for contractors to complete RBT as part of their assigned duties. Additionally, these internal controls should enforce compliance with EPA directives that RBT requirements be included in IT services contracts and that Senior Information Officials annually certify that this training has been completed.

EPA management stated that actions were taken to address Recommendation 3 in our prior audit report. However, we found that:

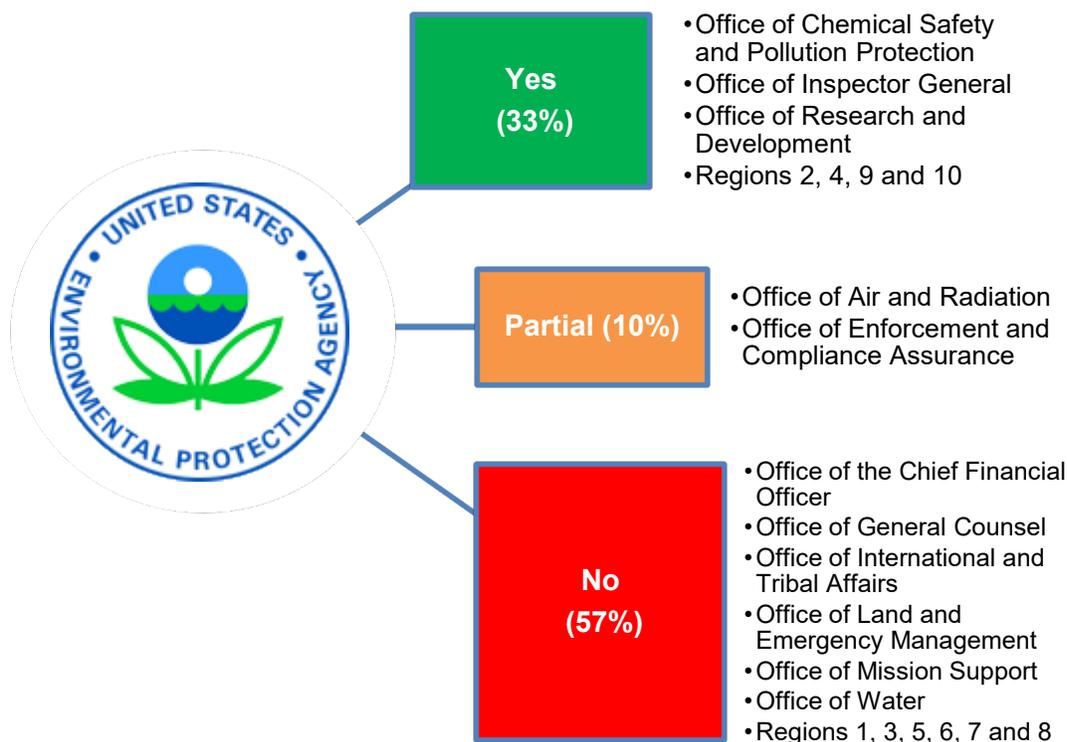
- Most EPA offices did not submit the FY 2018 certifications to the EPA's Chief ISO.
- RBT requirements were not included in existing IT services contracts.
- Agency personnel did not maintain a list of contractors requiring RBT.

As a result, the EPA lacked the necessary controls and information to validate that the RBT requirements are incorporated within the agency's reporting and acquisition processes. Consequently, EPA management did not have adequate assurance that its contractor staff is acquiring continuous training to strengthen their skills and knowledge to protect the EPA's security infrastructure from security breaches or cybersecurity incidents.

Immediate Action Needed to Validate Contractors Completed RBT

The EPA lacked necessary information to certify that contractor personnel supporting the agency's information security posture completed the annually required RBT. For FY 2018, only seven of 21 (33 percent) EPA offices submitted a complete response certifying that contractor personnel completed the required RBT, as shown in Figure 1.

Figure 1: FY 2018 certification submissions by EPA's offices and regions



Source: OIG analysis.

This situation occurred because the EPA did not have internal controls in place to validate that all program offices and regions submitted complete and accurate training certifications of compliance with RBT requirements. Due to a lack of internal controls, the EPA did not:

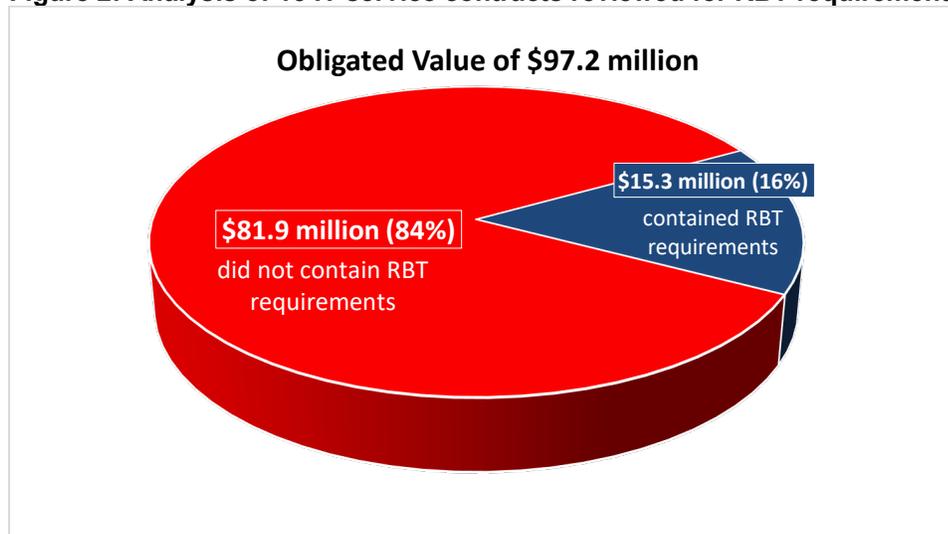
- Verify written certifications submitted by program offices and regions for accuracy and completeness, citing reliance upon the Senior Information Officials and ISOs to validate certification information with CORs at their respective offices.
- Follow up with those EPA offices that did not submit written certifications by September 30, 2018, citing the incorrect belief that the EPA's August 15, 2018, memorandum required the certifications beginning September 30, 2019, not September 30, 2018.

Without knowing that contractor personnel are maintaining professional competencies needed to satisfactorily perform their information security duties, there is limited assurance that EPA management can rely on the capabilities of its contractor workforce to protect the confidentiality, integrity and availability of the agency's networks, applications and data.

EPA Contracts Need Updating to Require that Contractors Complete Training to Protect the Agency’s Network

EPA IT services contracts lacked the requirements for contractor personnel with significant information security responsibilities to complete required RBT. Based on our review of 15 IT services contracts with a cumulative obligated value of \$97,171,967, only four of the contracts (valued at \$15,254,844, or 16 percent of the cumulative obligated value) contained a requirement for contractor personnel to complete RBT (Figure 2).

Figure 2: Analysis of 15 IT service contracts reviewed for RBT requirements



Source: OIG analysis.

In interviews, the CORs of the 15 IT services contracts that we sampled told us that they:

- Were not familiar with EPAAG 39.1.2.
- Did not know/believe it was their responsibility to include the EPAAG requirements in contracts.
- Had not been trained on how to incorporate the EPAAG 39.1.2 requirements within IT contractual documents.

Additionally, we learned that the EPA’s current process to include cybersecurity tasks—for example, RBT—in the agency’s contracts differs from previous processes. For example, the Interim Policy Notice 17-01, *Use of 22 Cybersecurity Tasks*, issued December 2016, required cybersecurity

EPAAG 39.1.2, “Cybersecurity Tasks,” dated April 2018, states:

- The agency’s cybersecurity technical expert is responsible for including any of the cybersecurity tasks as necessary in its performance work statements and statements of work.
- CORs who do not work in OEI [Office of Environmental Information] should seek assistance from OEI when choosing which, if any, of the subject cybersecurity tasks must be added or included in the COR’s performance work statements or statements of work.

tasks to be included in existing and new contracts (i.e., IT services contracts). However, EPAAG 39.1.2's business process to implement the EPAAG's cybersecurity requirements only includes the review of new contracts.

Without the RBT training requirements in the IT services contracts, the EPA has limited assurance that contractor personnel are maintaining and acquiring the technical skills and knowledge needed to help the EPA maintain a robust information security posture to withstand cyber activities designed for destroying, stealing or holding for ransom EPA information systems and sensitive information.

EPA Needs A Current List of Contractor Personnel Required to Complete RBT

EPA personnel did not consistently maintain a list of contractor personnel subject to the RBT requirement. For eight of the 15 IT services contracts that we sampled, EPA personnel did not maintain a roster of contractor personnel who need RBT. EPA CIO 2150-P-02.2, *Information Security – Awareness and Training Procedures*, requires ISOs to “identify all individuals requiring role-based security-related training within their respective program offices or regions.” This requirement applies to all personnel with significant security responsibilities or functions, including EPA employees, contractors and others working on behalf of the EPA.

EPA personnel overseeing contractors required to meet RBT requirements did not agree on where ownership for maintaining the list should reside, and the agency's procedures do not specify any position responsible for maintaining the list of individuals required to take RBT. For example, EPA personnel serving as CORs for contracts with RBT requirements commented that:

- Their role was to make sure that the contractors have system access, not to maintain a list.
- They relied on the contract Program Manager, Contracting Officer or Project Officer to maintain the list.

However, even though EPA procedures require the ISOs to identify contractors who need RBT, one ISO commented that the COR should maintain the list because the COR determines which contractors have significant information security roles based on their positions.

Without a list identifying which contractor personnel are required to complete RBT, agency personnel cannot effectively perform their assigned duties to provide EPA management assurance that its contractor workforce is highly skilled and trained to protect the EPA's security infrastructure from security breaches or cybersecurity incidents.

Conclusion

These findings were first reported in our Report No. [17-P-0344](#), issued July 31, 2017. In this report, we concluded that the EPA could not accurately identify the number of agency contractors who are performing significant information security duties and who are thus required to complete RBT. We are issuing this management alert report on these weaknesses because immediate improvements are needed to verify that contractors are trained in their roles to protect agency systems and data.

Recommendations

We recommend that the Assistant Administrator for Mission Support:

1. Develop and implement internal controls to validate that all EPA offices submit the required annual role-based training certification confirming that all contractors with significant information security responsibilities have completed the required role-based training for their respective offices.
2. Develop and implement internal controls to train EPA Contracting Officer's Representatives on mandatory role-based training requirements (i.e., EPA Acquisition Guide 39.1.2) that should be included in the EPA's information technology services contracts.
3. Implement a plan to analyze the EPA's information technology services contractual agreements initiated prior to EPA Acquisition Guide 39.1.2 to (a) determine how many of these agreements require modification to include role-based training requirements and (b) include the training requirements in the respective agreements.
4. Issue a memorandum to the regions and program offices requiring managers, supervisors and Contracting Officer's Representatives to provide their respective Information Security Officer with a list of contractor personnel required to complete role-based training so that the Information Security Officer can track personnel's completion of the required training.

Agency Response and OIG Evaluation

On June 3, 2019, we issued a discussion document to the EPA outlining our findings and recommendations. On June 27, 2019, the agency provided informal comments to the discussion document. We met with EPA officials on July 8, 2019, to further discuss their informal comments to the discussion document, as summarized below.

We also met with EPA senior officials on September 18, 2019, to discuss the status of the recommendations and informed them the OIG would not issue a draft report but would instead move directly to issuing a final report, as the EPA used the prior year's certification and reporting process for FY 2019.

The agency agreed with Recommendation 1. The EPA's Office of Mission Support provided documentation that supports it completed corrective actions to address Recommendation 1.

The agency agreed with Recommendation 2. We included additional language to Recommendation 2 based on general comments provided by the EPA regarding the finding on IT services contracts lacking cybersecurity requirements, and the EPA agreed with the revisions. However, Recommendation 2 remains unresolved because the EPA did not provide planned corrective actions with milestone dates.

Agency officials initially disagreed with Recommendation 3. However, following discussions with the agency, the OIG revised Recommendation 3. The EPA agreed with the revisions made to the recommendation but did not provide planned corrective actions with milestone dates. Therefore, Recommendation 3 is unresolved.

Agency officials initially disagreed with Recommendation 4. However, following discussions with the OIG, the EPA's Office of Mission Support provided us with a copy of recently issued guidance sent by the EPA's Chief ISO to EPA offices. This guidance reaffirms that the offices are required to submit annually to their respective ISO a list of contractor personnel requiring RBT. As such, the EPA completed corrective actions to address Recommendation 4.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS

| Rec. No. | Page No. | Subject | Status ¹ | Action Official | Planned Completion Date | Potential Monetary Benefits (in \$000s) |
|----------|----------|---|---------------------|---|-------------------------|---|
| 1 | 8 | Develop and implement internal controls to validate that all EPA offices submit the required annual role-based training certification confirming that all contractors with significant information security responsibilities have completed the required role-based training for their respective offices. | C | Assistant Administrator for Mission Support | 9/19/19 | |
| 2 | 8 | Develop and implement internal controls to train EPA Contracting Officer's Representatives on mandatory role-based training requirements (i.e., EPA Acquisition Guide 39.1.2) that should be included in the EPA's information technology services contracts. | U | Assistant Administrator for Mission Support | | |
| 3 | 8 | Implement a plan to analyze the EPA's information technology services contractual agreements initiated prior to EPA Acquisition Guide 39.1.2 to (a) determine how many of these agreements require modification to include role-based training requirements and (b) include the training requirements in the respective agreements. | U | Assistant Administrator for Mission Support | | |
| 4 | 8 | Issue a memorandum to the regions and program offices requiring managers, supervisors and Contracting Officer's Representatives to provide their respective Information Security Officer with a list of contractor personnel required to complete role-based training so that the Information Security Officer can track personnel's completion of the required training. | C | Assistant Administrator for Mission Support | 7/3/19 | |

¹ C = Corrective action completed.
R = Recommendation resolved with corrective action pending.
U = Recommendation unresolved with resolution efforts in progress.

Status of Corrective Actions on Prior OIG Report Recommendations

Below is the status of the EPA's corrective actions associated with the four recommendations in the prior OIG Report No. [17-P-0344](#), issued July 31, 2017, as documented in the agency's Management Audit Tracking System at the time of our audit:

- Recommendation 1 required the EPA to update the EPAAG to include cybersecurity tasks contained in Interim Policy Notice 17-01, *Use of 22 Cybersecurity Tasks* (December 2016). The agency reported that it completed the corrective actions on June 1, 2018.
- Recommendation 2 required the EPA to develop and implement a strategy to include the information security contract clause requiring contractors to complete RBT into all existing and future IT contracts and task orders. The EPA reported that it completed corrective actions on June 30, 2017.
- Recommendation 3 required the EPA to implement a process to require agency personnel to maintain a list of contractors who have significant information security responsibilities and are required to take RBT. Agency personnel are to validate and report to the Chief ISO that all contractors have completed required RBT. The EPA reported it planned to complete corrective actions on December 31, 2018.
- Recommendation 4 required the EPA to include the number of contractors who have significant information security responsibilities and have completed the required RBT in the CIO's Annual Federal Information Security Modernization Act reports submitted to the Office of Management and Budget. The EPA reported it completed the corrective actions on March 28, 2018.

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