



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

OFFICE OF  
INSPECTOR GENERAL

July 23, 2021

**MEMORANDUM**

**SUBJECT:** Notification of Audit:  
Addressing Cybersecurity Risks to Community Water Systems under the America's  
Water Infrastructure Act of 2018  
Project No. OA-FY21-0240

**FROM:** Michael D. Davis, Director *Michael D. Davis*  
Environmental Investment and Infrastructure Directorate  
Office of Audit

**TO:** Radhika Fox, Assistant Administrator  
Office of Water

The Office of Inspector General for the U.S. Environmental Protection Agency plans to begin an audit of cybersecurity requirements under the America's Water Infrastructure Act of 2018. This audit is being initiated in response to recent cybersecurity incidents at U.S. drinking water systems, such as the February 2021 cyberattack on the Oldsmar, Florida, water treatment plant that dangerously increased the level of sodium hydroxide. This audit also addresses the following top management challenge for the Agency, as identified in our [EPA's FYs 2020–2021 Top Management Challenges](#) report, issued July 21, 2020: enhancing information technology security.

The OIG's objectives are to:

1. Assess the adequacy of the cybersecurity baseline information that the EPA developed to meet the requirements of Section 2013 of the America's Water Infrastructure Act of 2018, as well as determine how community water systems used this information.
2. Assess the adequacy of EPA oversight to ensure that community water systems comply with Section 2013 of the America's Water Infrastructure Act of 2018.

The OIG plans to conduct work primarily at EPA headquarters and selected community water systems. Applicable generally accepted government auditing standards will be used in conducting our audit. The anticipated benefit of this audit is protecting drinking water by alerting the EPA to potential gaps in its oversight of water system cyber vulnerabilities.

We will contact the Office of Water audit follow-up coordinator to arrange a mutually agreeable time for an entrance conference to discuss our objectives. We would also be particularly interested in any areas of concern that you and your staff may have. We will answer any of your questions about the audit process,

reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the audit. Throughout the audit, we will provide updates on a regular basis.

To expedite our audit, please be ready to provide the following information at the entrance conference:

- A list of all cybersecurity incidents known to the EPA that occurred at community water systems since September 30, 2016.
- Contact information for EPA staff responsible for receiving certifications of risk and resilience assessments, as well as certifications for emergency response plans, from community water systems.
- Contact information for EPA staff responsible for the baseline information that the EPA published to fulfill the requirements of Section 2013 of the America's Water Infrastructure Act of 2018.

We respectfully note that the OIG is authorized by the Inspector General Act of 1978, as amended, to have timely access to personnel and all materials necessary to complete its objectives. Similarly, EPA Manual 6500, *Functions and Activities of the Office of Inspector General* (1994), requires that each EPA employee cooperate with and fully disclose information to the OIG. Also, Administrator Michael S. Regan, in an April 28, 2021 email message to EPA employees, conveyed his "expectation that EPA personnel provide OIG timely access to records or other information" and observed that "full cooperation with the OIG is in the best interest of the public we serve." We will request that you immediately resolve the situation if an Agency employee or contractor refuses to provide requested materials to the OIG or otherwise fails to cooperate with the OIG. We may report unresolved access matters to the administrator and include the incident in the *Semiannual Report to Congress*.

We will post this memorandum on our public website at [www.epa.gov/oig](http://www.epa.gov/oig).

cc: Janet McCabe, Deputy Administrator

Dan Utech, Chief of Staff, Office of the Administrator

Wesley J. Carpenter, Acting Deputy Chief of Staff, Office of the Administrator

Benita Best-Wong, Deputy Assistant Administrator for Water

Tiffany Crawford, Audit Follow-Up Coordinator, Office of Water

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