

CHAPTER 1 - IRM MANAGEMENT CONTROLS/REVIEW AND APPROVAL

1. PURPOSE. This policy establishes the principles and requirements that govern the management controls over EPA's IRM Program. This policy also defines the general delegations of authority which reflect the decentralized management structure of the IRM program. The framework of this policy draws from the basic management functions of planning, budgeting, acquisition, data management and evaluation to present a comprehensive management overview of EPA's IRM Program.

2. SCOPE AND APPLICABILITY. This policy applies to all EPA organizations and their employees. It also applies to the facilities and personnel of agents (including State agencies, contractors and grantees) of EPA who are involved in IRM activities.

3. BACKGROUND.

a. As noted in Section 5-c of this chapter, the Office of Information Resources Management (OIRM) has been delegated primary responsibility for managing EPA's IRM Program. However, the decentralized nature of this program requires the involvement and cooperation of all organizational units on an Agencywide basis.

b. The delegations of authority in EPA's IRM Program reflect the decentralized management structure of the Agency.

c. Management controls involved with EPA's IRM Program reflect a combination of internal Agency organizational requirements as well as those imposed on all Federal agencies by Congress and oversight agencies.

4. AUTHORITIES. (See Appendix B for further detail.)

a. OMB Circulars A-130, A-11, A-76, A-127, A-123, OMB Bulletins 86-12 and 86-19.

b. Federal Information Processing Standards Publications (FIPS PUBS).

c. Federal Information Resources Management Regulations (FIRMRS).

- d. The Brooks Act (P.L. 89-306).
- e. The Paperwork Reduction Act of 1980 (P.L. 96-511).
- f. GSA Bulletins.

5. DELEGATIONS OF AUTHORITY.

a. As noted in the introduction of this manual, the EPA Administrator has designated the Assistant Administrator for Policy, Planning and Evaluation (OPPE) as the Senior Official responsible for directing and overseeing EPA's activities administered under the Paperwork Reduction Act of 1980.

b. While the Assistant Administrator for OPPE has delegated much of the authority under the Act, he retained authority for managing and developing policy for EPA's IRM Program in regulatory situations, reviewing all Agency rules and regulations and other data collection instruments to ensure that the Agency does not impose an unnecessary paperwork burden on the public. The Assistant Administrator for OPPE also retains authority for managing the clearance process for data collection instruments. The vehicle for this activity is the Information Collection Request (ICR) clearance process. OPPE is also responsible for collecting, preparing and submitting the Agency's Information Collection Budget (ICB) to OMB. The Assistant Administrator for OPPE has delegated authority to manage other functions related to EPA's IRM Program to the Assistant Administrator for Administration and Resources Management (OARM) who in turn has redelegated the authority in this area to the Director, OIRM.

c. The Director, OIRM, has primary functional responsibility for IRM policy development and overall management of the Agency's IRM Program. This includes the planning, development and operation of information systems and services in support of the Agency's administrative, programmatic and research functions. It also includes administering Agency programs for library systems and services, records management, information security and implementation of the requirements of the Privacy Act.

d. EPA's Delegations Manual (Delegation 1-10) on automatic data processing (ADP), a copy of which is found in Exhibit 1-A of this chapter, cites the authorities which were originally delegated to the Assistant Administrator for Administration and Resources Management (OARM) and which have been subsequently redelegated to the Director, OIRM. This includes the authority to approve requisitions for ADP equipment, telecommunications, studies and services, including the authority to determine and approve:

- (1) The ADP technical content of solicitation packages.
- (2) The evaluation criteria to be used for evaluation of ADP components of proposals.
- (3) Preaward procedures for ADP components of proposals, including nominations for membership on the evaluation panel, contractor demonstrations and benchmarks and facility reviews as required.
- (4) Postaward procedures for ADP components of procurements including acceptance testing and site inspection.

ADP supplies (i.e., diskettes, tape, paper, cables) are considered as normal office supplies. They are exempt. The authority to approve requisitions for ADP equipment, computer services and telecommunications was redelegated by the Director, OIRM, to the Director, OARM-RTP. A further delegation has been made to the Director, NDPD.

e. Subject to certain conditions, the authority to approve acquisitions for microcomputer equipment, software and support services that conform to Agency standards has been delegated by the Director, OIRM, to:

- (1) Assistant Administrators
- (2) Associate Administrators
- (3) Inspector General
- (4) General Counsel
- (5) Regional Administrators

As noted in this delegation, which is found in Exhibit 1-B of this chapter, the officials specified above may further redelegate their authority in this area to their Senior Information Resources Management Officials (SIRMOs), provided that formal notification is provided to the Director, OIRM.

6. CONTROLS RELATED TO BASIC MANAGEMENT FUNCTIONS. The following sections describe management controls for IRM planning, budgeting, acquisition, data management and evaluation of IRM activities and requirements.

a. IRM Planning.

(1) Mission-based Planning. EPA is highly dependent on its information resources to carry out program and administrative functions in a timely, efficient and accountable manner. Because of the expensive and capital intensive nature of information and information technology, it is Federal policy that all managers plan effectively for the acquisition and management of information and information technology through the annual preparation of mission-based IRM plans. (Reference Chapter 2 of this manual). In EPA, all national program managers and Regional offices submit their plans to the Director, OIRM, who is responsible for reporting the contents of the plans to the Administrator and other senior EPA management officials. Mission-based IRM plans are tied to the budget process and are used to support investment decisions made during the budget preparation process.

(2) Planning Requirements for Acquiring and Managing Personal Computers (PCs). The basic purpose of the PC Plan is to ensure that appropriate provisions are made to provide effective management and support of this technology. All Headquarters and Regional offices must submit a PC Plan and qualify for a delegation of PC approval authority in order

to acquire personal computer hardware or software. Delegations will be made to those offices that have (1) designated a SIRMO to exercise the delegation on behalf of the Assistant or Regional Administrator, (2) received OIRM approval for their PC Plan and (3) designated and arranged appropriate training for a PC Site Coordinator(s) to manage PC ordering,

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processing and user support and develop security provisions for safeguarding these resources. Plans must be approved by the SIRMO in order to receive consideration by OIRM. Delegated officials, including PC Site Coordinators, will review PC procurement requests in light of approved plans and may then submit approved procurement requests to PCMD for placement/issuance of PC orders under the contract.

(3) Information Collection. The principles governing the information collection planning process are described in greater detail in Chapter 9 of this manual. From a management control perspective, it is important that Agency managers determine, before the information collection is initiated, that data are not already available elsewhere in the program, Agency or external sources. It is also necessary in the planning stage to design statistically valid sampling and collecting efforts and to determine that the cost of collecting the data does not exceed the value of the data to the program and EPA mission accomplishment.

(4) OMB Bulletin for Federal Information Systems and Technology Planning - OMB issues a bulletin on an annual basis which requires all Federal agencies to submit their strategic plans for information systems and technology. This plan contains the following kinds of information: a description of the agency's program priorities and a discussion of how information technology is being used to meet those priorities; a list of the agency's major information systems; and a description of significant information technology initiatives.

(5) OMB Bulletin for Management Review/Management

Improvement Planning - The Office of the Comptroller is responsible for coordinating and reporting EPA's management improvement plan to OMB. OIRM contributes to the Agency's plan by reporting milestones for initiatives which will improve the overall management of the Agency from an IRM perspective.

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b. Budgeting.

(1) Section 43 of OMB Circular A-11, "Preparation and Submission of Budget Estimates" - In EPA, this reporting requirement is referred to as "Short-Term ADP Planning." This report identifies and documents the Agency's information technology activities, the cost of those activities and the program initiatives that the technology supports. OIRM is responsible for coordinating the collection and reporting of this information for the Agency.

(2) Timeshare Budget - OARM-RTP with the assistance of OIRM, and in consultation with Agency components, prepares and submits the Agency timeshare budget. Timeshare requests are represented as a program element (PE) in the Agency's budget which is submitted to OMB. Once the budget is approved by Congress, OIRM administers the timeshare budget throughout the Agency in accordance with the needs and requests of Agency components and OARM-RTP guidance.

(3) Environmental Monitoring Budget Special Analysis - The purpose of this periodic analysis is to evaluate the investments supporting the Agency's environmental monitoring strategies. All major program offices are required to provide their individual monitoring analysis with their budget submissions. OPPE is responsible for assessing these reviews. The final product evaluates the resource requirements and priorities for monitoring activities across the Agency.

4) Information Collection Budget - During the third quarter of each fiscal year, OMB issues a bulletin which requires that agencies submit their projected reporting burden on the public for the forthcoming fiscal year. OPPE is responsible for coordinating and reporting the information collection budget for EPA.

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c. Procurement/Acquisition.

(1) Acquisitions are evaluated to meet GSA and other applicable regulations. Policies on EPA's IRM acquisitions are enforceable by OIRM, the Grants Administration Division (GAD) and the Procurement and Contracts Management Division (PCMD).

(2) From a management control perspective, PCMD inserts language into contracts to ensure that the contractors adhere to certain standards. Some of these standards are mandated by the Federal Information Resources Management Regulations (FIRMRs), Federal Standards and the Federal Information Processing Standards (FIPS). Other standards are developed by OIRM and NDPD. They are responsible for determining what standards apply to a particular procurement.

(3) OIRM provides ADP support services through centrally managed and administered contracts; program offices may submit procurement requests for such services to OIRM. OIRM provides guidance on effective utilization of these contracts and prepares the required delivery orders which are issued by PCMD.

d. Data Management. In the operation of any of EPA's automated systems there are a number of controls which are imposed in order to maintain efficiency and effectiveness. The following is a brief list of principal controls that development, operation and maintenance of their systems:

(1) Data Standards - Organizations responsible for system management are responsible for conforming with established Agency data standards. OIRM is responsible for establishing the data standards for the Agency and ensuring that those standards meet the Agency objective of promoting data sharing. Chapter 5 of the EPA Policy Manual provides further information on this subject.

(2) Systems Documentation - It is Agency policy that adequate documentation must be developed for all PA automated systems. This is important to ensure management control and continuity of service. Without adequate documentation, full utilization of of a system cannot be realized.

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(3) Acceptance Testing - Prior to implementing a system, appropriate acceptance testing must be conducted. Such activity serves to determine the reliability of functions as well as identify problems, both in the documentation and in the actual operation of the system. Acceptance testing must include proper documentation of test results.

(4) Systems Security - As stated in Chapter 8 of this manual, "It is EPA policy to protect adequately sensitive information and sensitive applications from improper use, alteration or disclosure, whether accidental or deliberate. Information and applications will be protected to the extent required by applicable law and regulations in accordance with the degree of their sensitivity in order to ensure the cost-effectiveness of the security program."

(5) User Support and Training- To ensure optimally efficient operation of Agency information systems, it is critical that EPA managers provide their staff adequate user support and training.

e. IRM Evaluations. The following evaluations and reviews are conducted to help the Agency assess the adequacy of its information systems and resources:

(1) Special Studies and Management Reviews - A variety of special studies and reviews are conducted by OIRM alone or in concert with Agency program offices. The scope of such reviews may vary depending on the subject matter and the goals and objectives established for the review or study.

(2) ADP Reviews - These reviews are conducted by IRM as well as program managers. All ADP review activity must be coordinated with the Office of the Inspector General which has the lead responsibility to perform independent reviews of EPA's activities. An ADP review is an evaluation of an information system, ADP equipment, operations or an ADP organization, to determine if the intended or expected functions are being accomplished. The general purpose of such a review is to improve management of information resources by ensuring that ADP systems and services are being managed in compliance with standards,

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operating procedures and policies. (Specific guidance on conducting this type of review is found in the Agency's Directives System - EPA 2115 Guide for ADP Review).

(3) Contract Performance Reviews - OIRM, in concert with PCMD, conducts regular (three times per year) reviews of contractor performance through meetings with delivery order project officers and the contractor under the ADP support contracts managed by OIRM. These meetings provide a forum to share information about experiences during delivery order performance that relate to key performance and contract administration issues.

(4) Risk Analyses - OMB Circular A-130 requires that all automated installations undergo a periodic risk analysis to ensure that appropriate, cost-effective safeguards are in

place. This risk analysis will be conducted on new installations, on existing installations undergoing significant change and on existing installations at least every 5 years.

(5) GSA Triennial Review - This review is a government-wide three-year planning and reporting cycle set forth to meet the requirements established by the Paperwork Reduction Act of 1980. Agencies are required to perform reviews of their information resources management activities and prepare synopses and updates of these reviews to GSA on a yearly basis for a three-year duration. The objective of the Triennial Review Program is to ensure that agencies are carrying out their information management activities in an efficient, effective and economical manner. OIRM is responsible for managing the review process with input from the program offices.

f. IRM Reporting Requirements.

(1) External - The following is a list of external reporting requirements related to EPA's IRM program:

(a) OMB Bulletin for Federal Information Systems and Technology Planning

(b) OMB Bulletin for Management Review/Management Improvement Planning

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(c) Section 43 of OMB Circular A-11

(d) GAO Systems Inventory

(e) ADP Equipment Data Systems to GSA

(f) Information Collection Budget

(g) Information Security Program Data o GSA

(h) Privacy Act Annual Report to OMB

(2) Internal - The following is a list of internal reporting requirements relating to EPA's IRM program:

(a) Mission-Based Plans

(b) PC Plans

- (c) Information System Inventory Updates
- (d) Timeshare Budget
- (e) Special IRM Budget Analysis (Addendum)
- (f) Environmental Monitoring Budget Special Analysis

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EXHIBIT 1-A

DELEGATIONS

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GENERAL, ADMINISTRATIVE AND MISCELLANEOUS

1-10. ADP

1. AUTHORITY. To approve requisitions for ADP equipment, telecommunications, studies, and services, including the authority to determine and approve:
 - a. The ADP technical content of solicitation packages
 - b. The evaluation criteria to be used for evaluation of ADP components of proposals
 - c. Preaward procedures for ADP components of proposals, including membership on the evaluation panel, contractor demonstrations and benchmarks, and facility reviews as required
 - d. Postaward procedures for ADP components of procurements including acceptance testing and site inspection.
2. TO WHOM DELEGATED. The Assistant Administrator for Administration and Resources Management.
3. REDELEGATION AUTHORITY. These authorities are redelegated to the Director, Office of Information Resources Management. The authority to approve requisitions for ADP equipment, computer services, and telecommunications is further redelegated to the Director, Office of Administration and Resources Management, RTP. All of the above authorities may be redelegated further.

OIRM DELEGATION

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EXHIBIT 1-B

MICROCOMPUTER REQUISITIONS

OIRM 1-10A

1. AUTHORITY

To approve requisitions for microcomputer equipment, software and support services.

2. TO WHOM DELEGATED

- a) Assistant Administrators
- b) Associate Administrators
- c) Inspector General
- d) General Counsel
- e) Regional Administrators

3. REDELEGATION AUTHORITY

a) The officials specified above may further redelegate this authority to a Senior Information Resources Management Official designated by them to have full responsibility for information resources management matters within their purview, provided that formal notification of this designation and redelegation is provided to the Director, Office of Information Resources Management.

b) The Senior Information Resources Management Officials designated by the above named officials may redelegate this authority to the heads of major EPA field installations, provided that there is prior notification to and approval by the Director, Office of Information Resources Management.

4. LIMITATIONS

a) The authorities delegated and redelegated herein may be exercised only upon approval of the organization's Personal Computer Acquisition and Management Plan by the Director, Office of Information Resources Management, and only in a manner that conforms to the provisions of the approved Plan.

- b) Microcomputer equipment and software are to be obtained from contracts established by the Office of Information Resources Management unless the required items are not available from those contracts or the ordering organization first documents that it is in the interest of the Agency to obtain these products from another source, and such documentation has been reviewed and approved by the Senior Information Resources Management Official or, in the event that further redelegation has been made, by the field installation head.
- c) Individual requisitions for microcomputer equipment and software that are to be obtained from sources other than the contracts established by the Office of Information Resources Management may not exceed \$50,000 without prior approval by the Director, Office of Information Resources Management.
- d) Requisitions for microcomputer equipment and software that do not conform to Agency standards may not exceed the following dollar limits in any single fiscal year without prior approval by the Director, Office of Information Resources Management:
 - (1) \$50,000 by each Assistant Administrator, Associate Administrator, the General Counsel, the Inspector General, Regional Administrator or their designated Senior Information Resources Management Official.
 - (2) \$10,000 for each major field site that has been redelegated authority to approve microcomputer requisitions pursuant to paragraph b) of Section 3. above.
- e) Requisitions that require synopsis in the Commerce Business Daily (i.e., sole source requisitions for specified make and model equipment costing \$10,000 or more, for open market purchases costing \$25,000 or more, and purchases from GSA Schedule contracts costing \$50,000 and more) require approval by the Director, Office of Information Resources Management prior to publication of the synopsis.
- f) Requisitions for local area network equipment or software must have prior approval from the Director, National Data Processing Division.

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- g) Requisitions approved pursuant to the authorities delegated and redelegated herein may not exceed the limits of the ADP procurement authority delegated to the Environmental Protection Agency by the General Services Administration.

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Resources Management