🌱 **EPA** INFORMATION DIRECTIVE
GUIDANCE

GUIDANCE FOR MANUALLY COMPLETING INFORMATION SECURITY AWARENESS TRAINING	
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Pursuant to Delegation 1-19,dated 07/07/2005

GUIDANCE FOR MANUALLY COMPLETING
INFORMATION SECURITY AWARENESS TRAINING

1. PURPOSE
The purpose of this guidance is to provide an alternative manual process for disseminating Environmental Protection Agency Information Security Awareness Training (ISAT) materials and collecting results from EPA users who elect to complete the ISAT manually.

2. SCOPE AND APPLICABILITY
This guidance covers all EPA information and information systems, to include those used, managed, or operated by a contractor, another agency, or other organization on behalf of EPA.

This guidance applies to all EPA employees, contractors, and all other users of EPA information and information systems that support the operations and assets of EPA.

3. AUDIENCE
Supervisors, managers, Contracting Officer's Representatives (CORs), Information Security Officers (ISO), that may use this method and users that may request to complete the ISAT using this alternative method.

4. BACKGROUND
Based on federal requirements and mandates, the EPA is responsible for ensuring that all EPA employees successfully complete the ISAT with a passing score of 85% or above as part of their initial hiring requirements and annually, thereafter. All EPA users shall meet this security requirement to maintain access to the EPA's information and information systems. This guidance provides an alternative manual process to the primary online process for EPA users to manually complete the ISAT and exam when the primary online process is unavailable or impractical.

This guidance incorporates and meets the EPA National Rules of Behavior (RoB) which indicates both electronic and manual methods are provided to users to acknowledge they have read, understand, and comply with these rules.

5. AUTHORITY

- E-Government Act of 2002, Public Law 107-347, Title III, *Federal Information Security Management Act (FISMA)* as amended
- Freedom of Information Act (FOIA), 5 U.S.C. § 552, as amended by Public Law 104-231, 110 Stat. 3048, Electronic Freedom of Information Act Amendments of 1996
- Clinger-Cohen Act of 1996, Public Law 104-106
- Paperwork Reduction Act of 1995 (44 USC 3501-3519)
- Privacy Act of 1974 (5 USC § 552a) as amended
- USA PATRIOT Act of 2001, Public Law 107-56
- Code of Federal Regulations, Part 5 Administrative Personnel, Subpart C—*Employees Responsible for the Management or Use of Federal Computer Systems*, Section 930.301 through 930.305 (5 C.F.R 930.301-305)
- OMB Circular A-130, "*Management of Federal Information Resources,*" Appendix III, "*Security of Federal Automated Information Resources,*" November 2000
- FIPS 200, *Minimum Security Requirements for Federal Information and Information Systems*, March 2006
- National Archives and Records Administration, 36 CFR Chapter XII, Subchapter B - *Records Management* (Parts 1220-1238)
- EPA Information Policy
- EPA Information Security Program Plan
- EPA Information Security – Awareness and Training Procedures
- EPA Information Security – Roles and Responsibilities Procedures
- EPA Information Security Continuous Monitoring Strategic Plan

6. GUIDANCE

General Guidance

When EPA employees and contractors find that they are unable to take the primary online ISAT due to the inaccessibility of the training, travel, attending off-site training or for other reasons, EPA employees must obtain approval to take the ISAT manually. EPA employees must receive approval from their program office or regional ISO and notify their supervisor, manager or COR. Once approval is granted, the EPA employee can take the ISAT manually.

New employees who have not yet gained access to the EPA system can also take the ISAT manually.

1) **EPA employees** are responsible for:

   a. Requesting approval from their ISO, and then notifying their manager, supervisor or COR in order to take the ISAT manually.

   b. Successfully completing the ISAT annually and within the determined deadline. They must meet the ISAT requirement, which includes reading each page, making a passing score of 85% and signing the RoB.

2) **Managers and Supervisors** are responsible for:

   a. Ensuring that users successfully complete the ISAT prior to initial access to EPA systems and information and at least annually thereafter to maintain access.

   b. Ensuring that the RoB are annually reviewed and signed or acknowledged electronically or manually by all information and information system users who support the operations and assets for which EPA is responsible.

   c. Ensuring EPA systems and information access is removed for users who do not comply with the annual ISAT and RoB.

3) **Contracting Officer's Representatives (COR)** are responsible for:

   a. Ensuring contracts contain information security clauses and language for safeguarding Agency interests through its contractual relationships.

      i) Ensuring initial and annual security awareness and RoB requirements are included in clauses and language when contractors access agency information or information systems.

   b. Assisting the Contracting Officer in the technical monitoring and administration of contract.

      i) Ensuring that users successfully complete ISAT prior to initial access to EPA systems and information and at least annually thereafter to maintain access.

      ii) Ensuring that the RoB are reviewed and signed or acknowledged electronically or manually on an annual basis by all information and information system users who support the operations and assets for which EPA is responsible.

      iii) Ensuring EPA systems and information access is removed for users who do not comply with the annual ISAT and RoB.

ISA Training Dissemination and Collection and Grading

1) A soft copy of the ISAT material must be provided in a timely manner to ensure all users successfully complete the training and sign the RoB by July 31st each year or as otherwise specified by the Chief Information Officer and/or the Senior Agency Information Security Officer. The ISAT material must include the following documents for the most current fiscal year:

   - Information Security Awareness Training word or text document,
   - Information Security Awareness Training exam (excluding all answers), and
   - EPA National Rules of Behavior.

   These documents are located on the website,
   http://intranet.epa.gov/oei/Cybersecurity.html

2) Dissemination, collection and grading must be coordinated by the respective Program Offices and Regions.

   a. The ISOs will be responsible for coordinating the dissemination and collection of the ISAT material.

      i. The ISOs will disseminate the training material to the respective managers, supervisors and CORs.
      ii. The ISOs will coordinate with the Mission Investment Solutions Division (MISD) within the Office of Environmental Information to ensure the status tracking tool is updated correctly.

   b. Users' managers and supervisors, and CORs for contractors, shall:

      i. Provide to all users that have not successfully completed the ISAT, the current ISAT and exam without answers and ensure they complete the ISAT and exam;
      ii. Provide to all users who have not signed the RoB, the current RoB and ensure they read and sign the RoB;
      iii. Review and grade users' ISAT exams;
      iv. Notify ISO of users' completion of the ISAT;
      v. Forward a copy of the exam including the results, and a signed copy of the RoB for each user to their ISO;
      vi. Maintain on file the original exams and results and signed RoB for each user; and
      vii. Provide for review the documents on file when requested.

3) ISOs will consolidate the results and provide to the MISD awareness training point of contact an email with all users' names, exam grade, and indicate whether the user signed the RoB.

   a. MISD will be responsible for updating the EPA training tracking tool as requested.

Dissemination and Collection Options

1) The ISAT material shall be disseminated and collected using one of the options below:

   a. Dissemination:

      i. Hard copy
         a) The manager, supervisor, or COR sends a hard copy of the training material via fax, mail or other similar delivery method.

      ii. Soft copy
         a) The manager, supervisor, or COR sends a soft copy of the training material by email. This option provides an easy tracking method and can also provide an easy signature method.

   b. Collection:

      i. Hard copy

         a) Users send a hard copy of the completed ISAT exam and signed RoB materials via fax, mail or other similar delivery method to their managers, supervisors and CORs.
         b) After verifying that the managers, supervisors and CORs have completed their own exams, ISOs provide the exam answer guide to the managers, supervisors and CORs.
         c) The managers, supervisors and CORs grade employees' exams and verify that RoBs are signed.
         d) Managers, supervisors and CORs maintain all graded training exams, results and signed RoBs on file. The exams, results and signed ROBs must remain on file in accordance with EPA Records Schedule 122, http://www.epa.gov/records/policy/schedule/sched/122.htm
         e) Managers and supervisors provide ISOs with training completion results with copies of graded exam, signed RoB via fax, mail or other similar delivery method.
         f) ISOs provide a completion memo / document to MISD.

      ii. Soft copy

         a) Users can attach the completed exam and a signed copy of the RoB acknowledgement in an email to their managers, supervisors, or CORs.
         b) The exam and exam results can be in the body of an email in addition to the RoB acknowledgement statement. Users can then digitally sign the email to their managers, supervisors, or CORs using the Microsoft Outlook's digital signature feature. If the signature fails, the users will need to contact their managers, supervisors, or CORs to obtain an electronic copy and follow the

process for sending the materials using another method listed in this guidance document.

Note: With either method, the email, along with the appropriate attachments, can be maintained electronically by the supervisor utilizing a tracking mechanism of their choice. With either method the email can be forwarded to MISD with appropriate information for processing the users' exam results and indication of receiving a signed RoB.

7. RELATED DOCUMENTS

a. NIST Special Publication (SP) 800-53 Series

8. ROLES AND RESPONSIBILITIES

Senior Agency Information Security Officer (SAISO)
The SAISO has the following responsibilities with respect to the manual ISAT:
   a. Develops the ISAT material and sets the deadline for all users to successfully complete the training.
   b. Develops and disseminates the EPA Rules of Behavior to the ISOs.
   c. Coordinates with the ISOs to ensure all EPA users are provided with the appropriate ISAT material to complete the training.

Information Security Officers (ISO)
ISOs have the following responsibilities with respect to the manual ISAT:
   a. Disseminates training materials and RoB to and collects results from the respective managers, supervisors, and CORs.
   b. Coordinates to ensure the status tracking tool is updated correctly.
   c. Provides MISD with the appropriate training results and proof of signed RoB from managers, supervisors, and CORs.

Managers, Supervisors, and Contracting Officer Representatives (CORs)
Managers, supervisors, and CORs have the following responsibilities with respect to the manual ISAT:
   a. Disseminates training materials and RoB to users and collects and grades ISAT exams.
   b. Collects and verifies that users sign the RoB.
   c. Notifies ISO of users' completion of the training.
   d. Provides ISOs copies of completed exams and signed RoB for each user.
   e. Maintains on file the original completed exam and signed RoB for each user.

Office of Environmental Information (OEI), Office of Technology Operations and Planning (OTOP), Mission Investment Solutions Division (MISD)

MISD has the following responsibilities with respect to the manual ISAT:

a. Updates the EPA eLearning tool with user's training exam results/grade and indicates whether the user signed the RoB.

EPA Users

EPA users have the following responsibilities with respect to the manual ISAT:

a. Requests approval from ISO to take the training manually and notifies supervisor.
b. Successfully completes the EPA ISAT with a score of 85% or better and within the allotted deadline.
c. Reads and signs the Rules of Behavior.
d. Provides managers, supervisors or CORs their original completed exam and signed RoBs.

9. DEFINITIONS

- *Hard copy* – A hard copy is a type of output that is a physical reproduction of data, such as a printed version of a document or file.
- *Soft copy* – A soft copy is an unprinted digital document, file, or some type of data that can be sent electronically such as via email or other type of network connection.

10. WAIVERS

The CIO may grant a waiver for sufficient reasons exercising judgment in the best interests of the Agency.

11. RELATED POLICY, PROCEDURES, STANDARDS, AND GUIDANCE

Related policy and procedures are available on OEI's Policy Resources website.

http://intranet.epa.gov/oei/imitpolicy/policies.htm

Related standards and guidelines are available on OEI's website.

12. MATERIAL SUPERSEDED

NA

13. ADDITIONAL INFORMATION

NA

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