



U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL

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EPA Needs to Improve Recording Information Technology Investments and Issue a Policy Covering All Investments

Report No. 15-P-0292

September 22, 2015



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Abbreviations

| | |
|------|--|
| CPIC | Capital Planning and Investment Control |
| EPA | U.S. Environmental Protection Agency |
| IT | Information Technology |
| OIG | Office of Inspector General |
| OMB | Office of Management and Budget |
| READ | Registry of EPA Applications, Models and Databases |
| RSTI | Research Science Technology Infrastructure |
| TIM | Technology Infrastructure Modernization |

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At a Glance

Why We Did This Audit

The Office of Management and Budget requires federal agencies to report information technology (IT) investments. The U.S. Environmental Protection Agency's (EPA's) policy states that it "... select[s] IT investments that support the Agency mission and align with its business needs, manage such investments with the goals of minimizing risks and maximizing returns, and evaluate the investments' results." Our objective for this audit was to determine whether the EPA's IT investments are managed efficiently and effectively to meet the agency's strategic goals and mission.

This report addresses the following EPA goal or cross-agency strategy:

- *Embracing EPA as a high-performing organization.*

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The full report is at: www.epa.gov/oig/reports/2015/20150922-15-P-0292.pdf

EPA Needs to Improve Recording Information Technology Investments and Issue a Policy Covering All Investments

What We Found

The EPA's Capital Planning and Investment Control (CPIC) is the agency's process for managing its IT investments. The EPA's method for recording all IT systems is the Registry of EPA Applications, Models and Databases (READ). EPA needs to require all investments recorded in CPIC to be recorded in READ, provided the investment meets the inclusion criteria. In addition, the EPA needs to issue a formal policy reflecting the actual practices for its CPIC process. We identified:

The EPA management of its \$334 million in IT investments is noncompliant with its current policy. Thus, the EPA is at risk of not managing taxpayer dollars properly.

- A Major investment with a fiscal year 2015 budget of \$15 million that was covered by the CPIC process but not recorded in READ.
- The CPIC process policy did not reflect the EPA's analyses of Medium and Lite investments with a total budget of over \$83 million.

The EPA indicated the Major investment did not meet the definition of an application or system. However, when we found it missing from READ, the EPA recorded it in its systems inventory. Thereafter, the EPA reversed its stance and decided it should not be included in READ. We believe that if investments meet the READ inclusion criteria, the EPA needs to require that all CPIC investments are recorded. The EPA also stated that the CPIC process policy revision was started in 2014 to include analysis procedures for Medium and Lite investments, but remains incomplete.

By not having an updated policy to reflect the current CPIC processes and practices related to Medium and Lite investments, the EPA increases the risk that these investments are not considered in its analysis and review of investments reported to the Office of Management and Budget.

Recommendations and Agency Corrective Action

We recommend the EPA update the CPIC process policy to require investments that meet the inclusion criteria be recorded in READ, the agency's systems inventory. Additionally, we recommend the EPA update the CPIC process policy to include a requirement to document the agency's formal evaluations of all Medium and Lite investments. We met with the agency after receiving the response and decided to modify the first recommendation. The EPA agreed with the recommendations and provided planned corrective actions and completion dates.



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

THE INSPECTOR GENERAL

September 22, 2015

MEMORANDUM

SUBJECT: EPA Needs to Improve Recording Information Technology Investments and Issue a Policy Covering All Investments
Report No. 15-P-0292

FROM: Arthur A. Elkins Jr.

A handwritten signature in black ink, appearing to read "Arthur A. Elkins Jr.", is written over the printed name.

TO: Ann Dunkin, Chief Information Officer
Office of Environmental Information

This is our report on the subject audit conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). 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.

Action Required

You are not required to provide a written response to this final report because you provided agreed-to corrective actions and planned completion dates for the report recommendations. Should you choose to provide a final response, we will post your response on the OIG's public 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 <http://www.epa.gov/oig>.

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Chapter 1

Introduction

Purpose

Our objective for this audit was to determine whether the U.S. Environmental Protection Agency's (EPA's) information technology (IT) investments are managed efficiently and effectively to meet the agency's strategic goals and mission.

Background

The Clinger-Cohen Act of 1996 (Public Law 104-106) requires the head of the executive agency to design and implement in the executive agency a process for maximizing the value and assessing and managing the risks of IT acquisitions. The agency process shall (1) provide for the selection of IT investments, the management of such investments, and the evaluation of the results of such investments, (2) be integrated with the processes for making budget, financial and program management decisions within the agency. The Office of Management and Budget (OMB) requires federal agencies to report IT investments. The EPA manages its investments via the Capital Planning and Investment Control (CPIC) process.

The EPA's CPIC policy, CIO POLICY TRANSMITTAL 06-003, Classification No. 2100.3, dated December 15, 2005, *Capital Planning and Investment Control Program Policy for Management of Information Technology Investments*, defines IT as applied computer systems, both hardware and software, and often including networking and telecommunications, usually in the context of a business or other enterprise. The policy defines an investment as an IT project, system, initiative, and/or acquisition. The EPA's policy states that it "...select[s] IT investments that support the Agency mission and align with its business needs, manage such investments with the goals of minimizing risks and maximizing returns, and evaluate the investments' results." The EPA's IT portfolio is the collection of its investments.

The CPIC process classifies EPA's IT investments into Major, Medium and Lite categories. Each classification has annual thresholds. They are stated in Table 1.

Table 1: IT CPIC Categories

| OMB Classification | EPA Classification | Reporting Format | EPA's IT Investment Annual Thresholds |
|---------------------------|---------------------------|---|--|
| Major | Major | EPA internal Exhibits. 100, 200, 300 & OMB Exhibit 53 | At least \$5M |
| Non-major | Medium | EPA internal Exhibits. 100, 200 & OMB Exhibit 53 | Less than \$5M but greater than or equal to \$2M |
| Non-major | Lite | EPA internal Exhibits. 100 & OMB Exhibit 53 | Between \$250K and \$2M |

Source: Office of Inspector General (OIG) analysis of EPA data.

The EPA's internal website explains that a Major investment is a program requiring special management attention because of its importance to the mission or function of the agency; has significant program or policy implications; has high executive visibility; has high development, operating or maintenance costs; is funded through other than direct appropriations; or is defined as Major by the EPA's capital planning and investment control process.

According to the agency's internal website:

EPA has an established Capital Planning and Investment Control (CPIC) "Medium" process to ensure that Agency information technology (IT) investments support EPA's vision, mission, and goals, and are implemented at acceptable costs within reasonable time frames. The cornerstone of this process is the IT Investment Proposal in the form of the CPIC Medium Reporting Template, required for all new and ongoing projects meeting established benchmarks for IT Investment Review. The IT Investment Proposal is designed to capture relevant information regarding EPA's IT investments, to address management objectives of the Quality and Information Council (QIC), legal requirements of the Clinger-Cohen Act, and other applicable laws.

However, the process for Medium investments is not documented in the agency's policy.

In 2004, the EPA's Information Investment Subcommittee recommended, and the Chief Information Officer approved, the implementation of workgroups to develop a process to capture, record and report on CPIC Lite projects. The agency clarified and obtained a clear understanding of OMB data requirements, then refined the definition of CPIC Lite projects.

The EPA CPIC process includes 89 investments that have a fiscal year 2014 budget of over \$334 million. Table 2 provides details for each investment category.

Table 2: EPA CPIC investments in IT for fiscal year 2014 budget

| CPIC Category | # of Investments | 2014 Budget |
|----------------------|-------------------------|----------------------|
| Major | 11 | \$251,176,000 |
| Medium | 19 | \$39,302,000 |
| Lite | 59 | \$44,017,000 |
| Total | 89 | \$334,495,000 |

Source: OIG analysis from EPA data and budget automation system.

The Registry of EPA Applications, Models and Databases (READ) is the EPA’s method for recording all IT systems at the agency. Each information resource has a record in READ that includes basic information such as the title, acronym, description, contact information, and organization that owns or operates it. READ does not contain budget, cost or expense data. As of August 2014 there were 1,855 records in READ that included both active and inactive records. Most records in READ are systems or applications. An application or system normally includes hardware, software, information and data. An application or system is a collection of elements, or components that are organized for a common purpose and satisfy a specific set of user requirements.

Responsible Office

The EPA’s Office of Environmental Information, Office of Technology Operations and Planning, Mission Investment Solutions Division, has responsibilities related to this audit. This division provides strategic planning, policy and guidance development for IT infrastructure management for the agency. The division’s key products and services include management of the agency’s CPIC processes for executive decision-making and reporting on the agency’s IT investment portfolio to OMB.

Scope and Methodology

We conducted this audit from June 2014 to June 2015 in accordance with generally accepted government auditing standards, issued by the Comptroller General of the United States. 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. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We reviewed OMB circulars and EPA policy related to IT management oversight. We interviewed program offices on the management of IT investments as well as obtained and reviewed the EPA’s inventory of registered IT systems from READ. We determined the universe of IT investments. Our audit focused on non-major investments, CPIC Medium and Lite investments, and registered IT systems in READ. We selected samples from the READ inventory and CPIC investments to help determine whether the agency is managing its investments. We judgmentally

selected eight of 1,075 active records from READ as of August 18, 2014, and three Medium and five Lite of the 89 CPIC investments. We based our sample selection on similar or duplicative system names or titles. We obtained and reviewed documentation for the samples as well as exchanged emails with program offices to determine whether the agency efficiently and effectively managed the investment to meet its strategic goals and mission.

Chapter 2

EPA Needs to Improve IT Investment System Registration and Issue a Policy for CPIC Medium and Lite Investments

The EPA needs to improve recording investments in its READ system registry and issue a formal policy reflecting its CPIC process covering Medium and Lite investments. We identified:

- A Major investment with a fiscal year 2015 budget of \$15 million that was covered by the CPIC process, but not recorded in READ.
- The CPIC process policy did not reflect the EPA's analyses of Medium and Lite investments with a total budget of over \$83 million.

The EPA indicated the Major investment did not meet the definition of an application or system. However, when we found it missing from READ, the EPA recorded it in its systems inventory. Thereafter, the EPA reversed its stance and decided it should not be included in READ.

The EPA stated the CPIC process policy revision was started in 2014 to include CPIC Medium and Lite investments, but remains incomplete. If the EPA continues to manage its \$334 million in IT investments different than outlined by its current policy, it may result in an inconsistent process across the agency.

We found that agency program offices manage IT investments efficiently and effectively to meet the agency's strategic goals and mission. However, due to the identified CPIC process issues, there is increased risk that the agency's funds may not be used efficiently and effectively over the CPIC process.

Major Investment Not in EPA's Registry of Systems Database

The EPA needs to require that its CPIC process include investments that are recorded in READ, provided they meet the READ inclusion criteria. The EPA does not review its registered systems in READ for any information that may be missing or not reported by program offices. Updates to READ depend on program offices voluntarily responding to data calls for relevant systems/models/applications. The EPA stated it "conducts a range of steps to ensure comprehensiveness," for example the "... READ program cross-walks, annually, the list of investments in CPIC with READ."

The EPA's *System Life Cycle Management Procedure CIO 2121-P-03.0*, dated September 21, 2012, establishes the EPA's approach and practices in the definition, acquisition/development, implementation, operations and maintenance,

and termination of EPA IT systems and applications. As part of the life cycle management, system owners are to add systems to the system registry. In each phase, system owners are required to review or update the related system/application record in READ, the EPA's system inventory registry.

During this audit, we identified a CPIC Major investment project—Research Science Technology Infrastructure (RSTI)—was not recorded in the EPA's READ inventory until our review. In fiscal year 2015, RSTI had a \$15 million budget. RSTI is in the operations and maintenance lifecycle phase. The Major investment provides the operations, maintenance and support services for scientific workstations, servers and storage and network infrastructure supporting the EPA's research component. The program office indicated that RSTI provides the labor and commercial services required to securely operate, maintain and provide user support. RSTI is described as a collection of infrastructure and services that is similar in structure to another CPIC major investment, the Technology Infrastructure Modernization (TIM) project. The program office did not record the project because their assessment did not fit the definition of application, system, or model.

We found the TIM project was recorded in READ. We discussed the difference with READ staff. As a result, READ staff requested the program office record RSTI to establish parallelism with the TIM investment and other CPIC investments. The program office recorded RSTI in January 2015. The EPA reversed its stance in July 2015 and stated:

the System Life Cycle Management Procedure... does not require investments to be registered in the system inventory. ... While there has been a record in READ for TIM, neither RSTI nor TIM are systems and thus neither should have records in READ. The data elements in READ are relevant for systems and generally are not applicable for an investment such as TIM or RSTI.

We agree that if the TIM and RSTI investments are similar, they should be recorded the same way. The EPA stated that the two investments were mistakenly recorded in READ. The CPIC process should ensure that the investments are recorded in the EPA's inventory of applications/systems if they meet the inclusion criteria.

Policy Does Not Include a Process for Reviews and Analyses of Medium and Lite Investments

The EPA did not have a policy pertaining to the CPIC process to support its analyses performed on CPIC Medium and Lite investments. The EPA was unable to provide documentation or evidence from the CPIC process of its review and analyses of CPIC Medium and Lite investments. The EPA indicated that the updated policy documents were not available because they were draft versions and

under agency review. Also, the agency stated it is a divisional policy that draft policies not approved by the Chief Information Officer are not sent out.

The agency stated that during the CPIC process it reviewed budget data for Medium and Lite investments as well as Major investments prior to submitting its portfolio of investments to OMB as part of its quality review. However, these reviews are not documented in the existing CPIC process policy. We could not determine whether the CPIC process reviews were adequate without documentation. Although not related to the CPIC process, we found that the Chief Architect performs an annual review of all CPIC investments and communicates the results in Excel spreadsheets to the project managers.

OMB Circular A-123, *Management's Responsibility for Internal Control*, as revised December 21, 2004, states in section II that internal control in the broadest sense, includes the plan of organization, methods and procedures adopted by management to meet its goals. OMB Circular A-130, Revised, Transmittal Memorandum No. 4, *Management of Federal Information Resources*, dated November 28, 2000, states in Section 8b(1), that “[t]he capital planning and investment control process includes all stages of capital programming, including planning, budgeting, procurement, management, and assessment.” The circular also states that agencies must establish and maintain a CPIC process that links mission needs, information and IT in an effective and efficient manner. In September 2014, the U.S. Government Accountability Office issued its revision of *Standards for Internal Control in the Federal Government*, which states that as part of internal control:

Management periodically reviews policies, procedures, and related control activities for continued relevance and effectiveness in achieving the entity's objectives or addressing related risks. If there is a significant change in an entity's process, management reviews this process in a timely manner after the change to determine that the control activities are designed and implemented appropriately.

In addition, the U.S. Government Accountability Office identified the following control activities for documentation:

Management clearly documents internal control and all transactions and other significant events in a manner that allows documentation to be readily available for examination. The documentation may appear in management directives, administrative policies, or operating manuals, in either paper or electronic form. Documentation and records are properly managed and maintained.

The EPA's current CPIC process policy, issued in 2005, were developed for managing its Major investments, and do not include a process for the review and analysis of Medium and Lite investments, which are non-major investments. The CPIC process policy states that recertification should occur 3 years from the issuance date. The agency started updating its CPIC policy in May 2014. It expects updated CPIC processes to be included in the updated policy and procedure, scheduled to be finalized by December 2015.

If the EPA continues to manage IT investments different than required by its current policy, then operations may be inconsistently applied across the agency. Documentation of assessments of Medium and Lite investments over time will help the agency discover when it is not achieving the anticipated results/objectives or when it needs to take actions to correct or remediate deficiencies.

Conclusion

The EPA must include all CPIC investments in its registry of systems, provided the investment meets the READ inclusion criteria. If all investments are not recorded in READ, the EPA does not have a complete inventory of its systems that are reported to OMB during the CPIC process. Also, the EPA should have a CPIC process policy to support its analyses of Medium and Lite investments performed during the CPIC process. By not having an updated policy to reflect the current CPIC processes and practices related to Medium and Lite investments, the EPA increases the risk that these investments, with total budgets over \$83 million, are not considered in its analysis and review of investments reported to OMB. In addition, there is increased risk that agency funds may not be used efficiently and effectively over the CPIC process.

Recommendations

We recommend the Assistant Administrator for Environmental Information:

1. Update the CPIC process policy to require investments that meet the inclusion criteria be recorded in READ, the agency's systems inventory.
2. Update the CPIC process policy to include a requirement to document the agency's formal evaluations of all Medium and Lite investments.

Agency Response to Recommendations and OIG Evaluation

In its response to our draft report, EPA agreed with recommendation 2, but did not agree with recommendation 1. The EPA proposed a modification to recommendation 1 and we agreed to modify our recommendation because the change meets the intent of our original recommendation. We also made additional

changes throughout the report to address the agency’s general comments for the issue relating to recommendation 1.

On August 12, 2015, we held an exit conference with EPA and it agreed to our modified recommendation 1 and agreed to provide its planned corrective actions and completion dates for both recommendations. On August 24, 2015, EPA provided the following actions and dates in Table 3.

Table 3: Agency planned correct actions and completion dates

| Recommendation | Planned Corrective Action | Completion Date |
|-----------------------|---|------------------------|
| 1 | The Office of Environmental Information will update CPIC policy and procedures to incorporate the requirement to have all systems that are part of an investment and that comply with the READ inclusion criteria must be registered in READ. | 12/31/15 |
| 2 | The Office of Environmental Information will update the CPIC policy and procedures to incorporate a portfolio review process called “Pre Exhibit 100 Reviews” to gain in depth insight into EPA Major and non-Major investments. | 12/31/15 |

Source: EPA email.

The complete agency response to the draft audit report is in Appendix A.

Status of Recommendations and Potential Monetary Benefits

| RECOMMENDATIONS | | | | | | POTENTIAL MONETARY BENEFITS (in \$000s) | |
|-----------------|-------------|---|---------------------|--|-------------------------------|--|---------------------|
| Rec. No. | Page No. | Subject | Status ¹ | Action Official | Planned Completion Date | Claimed Amount | Agreed-To Amount |
| 1 | 8 | Update the CPIC process policy to require investments that meet the inclusion criteria be recorded in READ, the agency's systems inventory. | O | Assistant Administrator of Environmental Information | 12/31/15 | | |
| 2 | 8 | Update the CPIC process policy to include a requirement to document the agency's formal evaluations of all Medium and Lite investments. | O | Assistant Administrator of Environmental Information | 12/31/15 | | |

¹ O = Recommendation is open with agreed-to corrective actions pending.
 C = Recommendation is closed with all agreed-to actions completed.
 U = Recommendation is unresolved with resolution efforts in progress.

Agency Response to Draft Report

July 29, 2015

MEMORANDUM

SUBJECT: Response to Office of Inspector General Draft Report No OA-FY14-0307 “*EPA Needs to Improve Registering Information Technology Investments and Issue Policies and Procedures Covering All Investments,*” dated June 30, 2015.

FROM: Ann Dunkin /s/
Chief Information Officer

TO: Arthur A. Elkins, Jr.
Inspector General

Thank you for the opportunity to respond to the issues and recommendations in the subject audit report. Following is a summary of the agency’s overall position, along with its position on the draft report recommendations and general comments.

OVERALL POSITION: OEI does **not** agree with recommendation 1 as written. As noted throughout the draft IG report, READ is the Agency’s system inventory while CPIC is the process by which EPA manages IT investments. For those instances in which an IT investment supports the management and/or development of a system or multiple systems, those systems, provided they meet the criteria, should have records in READ. READ is the Agency’s system inventory; IT investments are managed through the CPIC process. OEI concurs with recommendation 2.

If you have any questions regarding this response, please contact Judi Maguire, OEI’s Audit Follow-up Coordinator at maguire.judi@epa.gov or (202)564-7422.

Attachment

COMMENTS ON RECOMMENDATION 1

IG Recommendation: “We recommend the Assistant Administrator for Environmental Information:

1. Update the CPIC process policies and procedures to require all current, new, and potential investments to be registered in the agency system registry READ, and validated by program offices.”

OEI Response: OEI does **not** agree with this recommendation as written. As noted throughout the draft IG report, READ is the Agency’s system inventory while CPIC is the process by which EPA manages IT investments. For those instances in which an IT investment supports the management and/or development of a system or multiple systems, those systems, provided they meet the criteria, should have records in READ. READ is the Agency’s system inventory; IT investments are managed through the CPIC process.

A more accurate recommendation would be: “We recommend the Assistant Administrator for Environmental Information:

1. "Update CPIC policy and procedures to require all systems that are supported via a CPIC investment, be registered in the agency system inventory, READ, and validated by program offices, provided the system meets the READ inclusion criteria.”

GENERAL COMMENTS:

The draft IG report states that EPA does not take steps to ensure systems are registered in READ:

IG Statement: “The EPA needs to improve registering systems in READ and ensure registration of all CPIC investments reported to OMB. The EPA does not review its registered systems in READ for any information that may be missing or not reported by program offices. Updates to READ depend on program offices voluntarily responding to data calls for relevant systems/models/applications.”

OEI Response: This is not accurate. While READ relies on program offices and regions to manage their respective portfolios, which includes identification of new systems that should have records in READ, EPA also conducts a range of steps to ensure comprehensiveness: 1) EPA’s Application Development Checklist (ADC), which is the process by which EPA manages system upgrades as well as the installation of new systems at the National Computer Center, requires a READ ID; 2) the READ program cross-walks, annually, the list of systems in the security tool, XACTA, with READ; and 3) the READ program cross-walks, annually, the list of investments in CPIC with READ. The cross-walk between CPIC and READ did not result in the addition of RSTI because RSTI is an investment, not a system.

The draft IG report states that RSTI, an ORD investment, should have a record in READ:

IG Statement: “The EPA’s System Life Cycle Management Procedure CIO 2121-P-03.0, dated September 21, 2012, establishes the EPA’s approach and practices in the definition, acquisition/development, implementation, operations and maintenance, and termination of the EPA IT systems and applications. As part of the life cycle management, system owners are to add systems to the system registry. In each phase, system owners are required to review or update the related system/application record in READ, the EPA’s system inventory registry.

In fiscal year 2015, RSTI had a \$15 million budget. RSTI is in the operations and maintenance lifecycle phase. The Major investment provides the operations, maintenance and support services for scientific workstations, servers, and storage and network infrastructure supporting the EPA's research component. The program office indicated that RSTI provides the labor and commercial services required to securely operate, maintain and provide user support. RSTI is described as a collection of infrastructure and service that is similar in structure to another CPIC major investment, the Technology Infrastructure Modernization (TIM) project. The program office did not register the project because their assessment did not fit the definition of application, system or model”

OEI Response: As the System Life Cycle Management Procedure indicates, systems should be registered in the system inventory; this procedure does not require investments to be registered in the system inventory. RSTI, as noted in the IG report, is an investment and is “described as a collection of infrastructure and services.” While there has been a record in READ for TIM, neither RSTI nor TIM are systems and thus neither should have records in READ. The data elements in READ are relevant for systems and generally are not applicable for an investment such as TIM or RSTI.

Distribution

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