



At a Glance

Why We Did This Review

The Hazardous Waste Electronic Manifest Establishment Act of 2012 requires the U.S. Environmental Protection Agency (EPA), Office of Inspector General (OIG), to conduct an annual audit of the financial statements of activities carried out using amounts from the electronic manifest (e-Manifest) fund. As part of the mandatory audit, we conducted this additional audit to determine whether EPA management complied with applicable laws, regulations and agency guidance in the development of the e-Manifest system.

The e-Manifest system is being designed to create a means to track off-site shipments of hazardous waste from a generator's site to the site of the receipt and disposition of the hazardous waste.

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

- *Protecting human health and the environment by enforcing laws and assuring compliance.*

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Acquisition Certifications Needed for Managers Overseeing Development of EPA's Electronic Manifest System

What We Found

Program and project managers responsible for overseeing development of the e-Manifest system did not obtain the required federal certification necessary to oversee a major acquisition.

The Federal Acquisition Certification for Program and Project Managers (FAC-P/PM) outlines certification requirements that managers must meet to oversee major acquisitions. Senior management within the Office of Land and Emergency Management was aware of the FAC-P/PM requirement, but did not require the program manager to become certified because the program manager did not perform information technology (IT) work on the e-Manifest system. However, the program manager's duties include a major role in acquisition, budget formulation and goal-setting processes for the e-Manifest system development project. The EPA did not have evidence on file that either the program and/or project manager met the requirements for the FAC-P/PM. The project manager's supervisor informed the project manager that the FAC-P/PM was needed, but no action was taken to enforce completion of the requirement by the project manager.

Also, the EPA's February 2009 interim policy is outdated and does not reflect the December 2013 revisions made to the FAC-P/PM by the Office of Management and Budget. This includes defining the EPA requirements for how agency personnel obtain the FAC-P/PM-IT specialization required for managing major IT investments. As such, personnel managing the e-Manifest project lacked this specialized certification, and no date has been set for when personnel will complete the requirement.

Ineffective project oversight could cause project delays that prolong the EPA's ability to provide emergency responders with data about hazardous waste shipped between generators' sites and waste management facilities.

Recommendations and Planned Agency Corrective Actions

The EPA agreed with both of our recommendations and provided planned corrective actions with estimated completion dates. Corrective actions that address the intent of Recommendation 1 were completed, and that recommendation is closed upon issuance of this report. Planned corrective actions for Recommendation 2 address the intent of that recommendation, and that recommendation will remain open with corrective actions pending.