



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

OFFICE OF
INSPECTOR GENERAL

February 15, 2017

MEMORANDUM

SUBJECT: Project Notification:
Audit of EPA's Processes for Managing Background Investigations of Privileged Users and Taking Action to Remediate Weaknesses in Agency's Information Security Program
Project No. OA-FY17-0139

FROM: Rudolph M. Brevard, Director *Rudolph M. Brevard*
Information Resources Management Audits
Office of Audit

TO: Steven Fine, Ph.D., Acting Assistant Administrator
Office of Environmental Information

Donna J. Vizian, Acting Assistant Administrator
Office of Administration and Resources Management

The Office of Inspector General (OIG) for the U.S Environmental Protection Agency (EPA) plans to begin preliminary research on the subject audit. We are conducting this project as a discretionary audit. The OIG's audit objectives are to determine whether the EPA:

- Completed required background investigations for contractor personnel with privileged access to EPA information systems.
- Completed and documented actions taken to remediate weaknesses in the agency's information security program.

Audit work will be conducted at EPA program offices at headquarters and other locations, as needed. Applicable generally accepted government auditing standards will be used in conducting our audit. The anticipated benefits of this audit are to help the EPA strengthen its management control processes for (1) conducting background investigations for contractor personnel with privileged users to prohibit unauthorized access to and alteration of agency network security controls and data, and (2) remediating known vulnerabilities that expose the EPA's network to cybersecurity attacks.

We will contact you to arrange a mutually agreeable time to discuss our objectives and the purpose of our audit. We would also be particularly interested in any areas of concern that you may have. We will answer any of your questions about the project process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the course of the project. Throughout the project, we will provide updates on the status of the project every 6 weeks, either by email, phone call, or meetings with the appropriate program and regional offices' officials and the respective audit follow-up coordinators.

We request that the Office of Environmental Information and Office of Administration and Resources Management provide the information listed in Enclosure 1. Each of the offices should provide the OIG with the information requested in the enclosure by March 1, 2017.

We respectfully note that the OIG is authorized by the Inspector General Act of 1978 to have timely access to personnel and all materials necessary to complete its objectives. We will request your resolution if an agency employee or contractor refuses to provide requested records 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.

I will be supervising the project, and the Project Manager will be Vincent Campbell. Any information related to the project should be addressed to me at (202) 566-2540 or brevard.rudy@epa.gov, or Vincent Campbell at (202) 566-2540 or campbell.vincent@epa.gov.

Enclosure

cc: EPA Assistant Administrators
EPA Regional Administrators
EPA Deputy Assistant Administrators
EPA Deputy Regional Administrators
EPA Program and Regional Audit Follow-Up Coordinators
Sean Kelley, Director, Office of Information Security and Privacy, Office of Environmental Information
Benita Deane, Agency Follow-Up Coordinator
George Hull, Acting Associate Administrator for Public Affairs
Julia Valentine, Acting Director, Office of Media Relations, Office of Public Affairs
Arthur A. Elkins Jr., Inspector General
Charles Sheehan, Deputy Inspector General
Alan Larsen, Counsel to the Inspector General
Kevin Christensen, Assistant Inspector General for Audit
Carolyn Copper, Assistant Inspector General for Program Evaluation
Patrick Sullivan, Assistant Inspector General for Investigations
Edward Shields, Acting Assistant Inspector General for Management
Richard Eyer mann, Deputy Assistant Inspector General for Audit
Jennifer Kaplan, Deputy Assistant Inspector General for Congressional and Public Affairs
Jeffrey Lagda, Congressional and Media Liaison, Office of Inspector General

Audit Documentation Request
Audit of EPA's Processes for Managing Background Investigations of Privileged Users
and Taking Action to Remediate Weaknesses in Agency's Information Security Program
Project No. OA-FY17-0139

Office of Environmental Information should provide:

1. Listing of all contractors' personnel with privileged users access. This listing should include personnel's name, contract/task order number, program office/region, information security officer, and contract office representative/contract officer technical representative.
2. Listing of all "open" Plans of Actions and Milestones (POA&Ms) as of January 31, 2017. Provide the data for these data fields in an Excel spreadsheet:
 - a. Folder (Responsible Office)
 - b. Project (System Name)
 - c. POA&M Number
 - d. Title
 - e. Days Overdue
 - f. Creation Date
 - g. Weakness
 - h. Severity Code
 - i. Point of Contact
 - j. Resources Required
 - k. Schedule Completion Date
 - l. Waiver Expiration Date
 - m. Actual Completion Date
 - n. Adjusted Closure Date(s)
 - o. Changes to Milestones
 - p. Item Identified During
 - q. Overall Status
3. Listing of all POA&Ms that need to be scheduled. Provide the data in an Excel spreadsheet.
4. Most current status report on background investigations for contractors with privileged access. Provide the data in an Excel spreadsheet.

Office of Administration and Resources Management should provide:

1. EPA policy and procedures for processing background investigations for contractors, including those identified as privileged users.
2. EPA policy and procedures on identifying and including appropriate contract clauses needed in contracts/task orders that govern contractors with privileged access to EPA's systems.
3. EPA policy and procedures specifying contractors' roles and duties as non-privileged users and privileged users.