



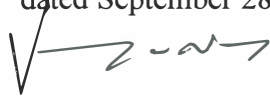
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

DEC - 4 2018

OFFICE OF MISSION SUPPORT

MEMORANDUM

SUBJECT: Response to Office of Inspector General Final Report  
No. 18-P-0298 "*Management Alert: EPA's Incident Tracking System Lacks Required Controls to Protect Personal Information,*" dated September 28, 2018

FROM: Vaughn Noga, Chief Information Officer  
and Deputy Assistant Administrator 

TO: Charles Sheehan, Acting 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 each of the report recommendations. For those report recommendations with which the agency agrees, we have provided either high-level intended corrective actions and estimated completion dates to the extent we can or reasons why we are unable to provide high-level intended corrective actions and estimated completion dates at this time. For those report recommendations with which the agency does not agree, we have explained our position and proposed alternatives to recommendations.

AGENCY'S OVERALL POSITION

OEI cooperated fully and assisted the IG in reviewing the data collected and captured in the tool during this audit. Once information was discovered that did not meet the controls for the system, we worked quickly to address the vulnerabilities. We were already in the process of transition from our current tool BMC Remedy to ServiceNow (SNOW) when the audit was initiated. While the new tool tracks IT incidents, it is designed to be a complete IT Service Management (ITSM) solution for the Agency with greater capabilities and better controls. We capture about 8,000 to 10,000 Incident requests monthly over the phone, through email and through our web portal (ServiceNow – Only). In tracking these incidents, we do not ask for, nor solicit PII or SPII information from users (EPA employees and contractors). However, this information may have been inadvertently submitted with the email requesting resolution to payroll and human resource records issues, as documented in the report. The incidents containing PII or SPII represented less than 1% of the data collected in the system.

After reviewing the findings with the IG, we redacted PII and SPII submitted by users in the system as well as corrected password setting to enforce Agency policy, resetting every 60 days. Exposure to these records with PII/SPII was limited to contractors and federal staff who have access to enter this information and assign incidents. Currently about 500 active users have this access, but not all have

access to every record. The system does keep track of which records were viewed or updated and by whom.

While moving to the new system, we have ensured that all incidents are checked for PII and SPII inadvertently submitted by users and redacted immediately. All controls are verified and meet current Agency standards and will be reviewed to ensure compliance. We anticipate transition to ServiceNow will be complete and the current system (Remedy) will be decommissioned in fiscal year 2019.

AGENCY’S RESPONSE TO REPORT RECOMMENDATIONS

Agreements

No.	Recommendation	High-Level Intended Corrective Action(s)	Estimated Completion by Quarter and FY
1	Develop and implement a strategy that protects the confidentiality of personally identifiable information and sensitive personally identifiable information, as required by federal and EPA privacy and password guidance, for incident tickets in the current incident tracking system.	Implement a strategy to redact PII and SPII in incident tickets, and disconnect the current incident ticketing system from the network by September 30, 2018.	9/30/2018
2	Update standard operating procedures for EPA incident tracking system help desk technicians. Establish controls for technicians to comply with federal personally identifiable information requirements when they handle incident tickets that require them to collect personally identifiable information and sensitive personally identifiable information.	EPA management indicated that standard operating procedures were updated on July 31, 2018, and they provided a copy of the updated procedures.	7/31/2018
3	Complete a System of Records Notice for the replacement incident tracking system.	A new System of Records Notice for the replacement incident tracking system will be completed at the end of Q3FY19.	End of Q3FY19
4	Update the EPA’s system security plan, privacy impact assessment and other necessary security documentation to specify that the replacement system will contain personally identifiable information and	SSP, PIA and other necessary documentation for SNOW and Remedy will be updated to reflect what is in the recommendation.	End of Q1FY20

	sensitive personally identifiable information.		
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Disagreements

None

CONTACT INFORMATION

If you have questions, please contact OEI's Audit Follow-Up Coordinator, Carrie Hallum, at 202-566-1274 or at [hallum.carrie@epa.gov](mailto:hallum.carrie@epa.gov).

Attachments

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