



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

FEB 21 2019

OFFICE OF
INSPECTOR GENERAL

MEMORANDUM

SUBJECT: Acceptance of Planned Corrective Actions for Office of Inspector General Report No. 18-P-0298, *Management Alert: EPA's Incident Tracking System Lacks Required Controls to Protect Personal Information*, Issued September 28, 2018

FROM: Charles J. Sheehan, Acting Inspector General *CJS*

TO: Donna J. Vizian, Principal Deputy Assistant Administrator
Office of Mission Support

In your December 4, 2018, memorandum to the U.S. Environmental Protection Agency (EPA), Office of Inspector General (OIG), you provided the EPA's planned corrective actions for Recommendations 3 and 4 of the subject report. You previously provided planned corrective actions for Recommendations 1 and 2, which we accepted.

These additional planned corrective actions meet the intent of Recommendations 3 and 4. Therefore, all recommendations for the subject report are now considered resolved. We will close the remaining recommendations in the OIG tracking system as of the date of this memorandum. You should track implementation of EPA corrective actions in the agency's Management Audit Tracking System until all actions are completed.

If you or your staff have any questions, please contact Kevin Christensen, Assistant Inspector General for Audit and Evaluation, at (202) 566-1007 or christensen.kevin@epa.gov; or Rudolph M. Brevard, Director, Information Resources Management Directorate, at (202) 566-0893 or brevard.rudy@epa.gov.

Attachment

cc: Vaughn Noga, Deputy Assistant Administrator for Environmental Information and Chief Information Officer, Office of Mission Support
Holly Greaves, Agency Follow-Up Official (the CFO)
Troy Lyons, Associate Administrator for Congressional and Intergovernmental Relations
Nancy Grantham, Principal Deputy Associate Administrator for Public Affairs
Robert McKinney, Director, Office of Information Security and Privacy, Office of Mission Support
Bob Trent, Agency Follow-Up Coordinator
Lorena Cedeno-Zambrano, Audit Follow-Up Coordinator, Office of Mission Support
Kevin Christensen, Assistant Inspector General for Audit and Evaluation
Richard Eyermann, Deputy Assistant Inspector General for Audit and Evaluation
Christine El-Zoghbi, Deputy Assistant Inspector General for Audit and Evaluation
Rudolph M. Brevard, Director, Information Resources Management Directorate,
Office of Inspector General

**OIG Evaluation of Office of Mission Support's (OMS's)
Response to Recommendations**

OMS'S OVERALL POSITION:

The agency agrees with the recommendations.

No.	Recommendation	High-Level Intended Corrective Action(s)	Estimated Completion by Quarter and FY	OIG Evaluation
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.	09/30/2018 Revised milestone date provided by the EPA: 12/31/2019	The OIG concurs with the corrective actions taken by the EPA to address this recommendation. The OIG considers this recommendation resolved.
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.	07/31/2018	The OIG concurs with the corrective actions taken by the EPA to address this recommendation. The OIG considers this recommendation resolved.

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 Q3 FY19.	End of Q3FY19	The OIG concurs with the planned corrective actions to address this recommendation. The OIG considers this recommendation resolved.
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 sensitive personally identifiable information.	System security plan (SSP), privacy impact assessment (PIA) and other necessary documentation for SNOW and Remedy will be updated to reflect what is in the recommendation.	End of Q1FY20	The OIG concurs with the planned corrective actions to address this recommendation. The OIG considers this recommendation resolved.