August 15, 2022

MEMORANDUM

SUBJECT: Notification of Audit:
The EPA’s Central Data Exchange Access Security Controls
Project No. OA-FY22-0144

FROM: LaSharn Barnes, Director
Information Resources Management Directorate
Office of Audit

TO: Kimberly Patrick, Principal Deputy Assistant Administrator
Office of Mission Support

The Office of Inspector General for the U.S. Environmental Protection Agency plans to begin an audit to review the EPA’s Central Data Exchange Access Security Controls. This audit is the result of several Office of Investigations referrals made to our office related to potential systemic issues regarding the EPA’s CDX system and the system’s interconnected program applications. This audit also addresses the following fiscal year 2022 top management challenge: protecting information technology and systems against cyberthreats.

The OIG’s objective is to determine whether the EPA has established sufficient controls to prevent unauthorized access to the EPA’s Central Data Exchange. The OIG plans to conduct work at the National Computer Center at Research Triangle Park in Durham, North Carolina. Applicable generally accepted government auditing standards will be used in conducting our audit. The anticipated benefit of this audit includes strengthening the EPA CDX’s security controls to prevent creation of fraudulent accounts in the CDX system. This is especially important because the CDX is the gateway to other environmental applications.

We will contact you to arrange a mutually agreeable time to discuss our objective. We would also be particularly interested in any areas of concern that you may have. We will answer any of your questions about the audit process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the audit. Throughout the audit, we will provide updates on a regular basis.

To expedite our audit, please be ready to provide the following information at or closely following the entrance conference:

- The points of contact most knowledgeable about CDX.
- The current system security plan and privacy impact assessment for CDX.
- Networking maps that depict user access to CDX and any interconnected systems.
• Policies, procedures, guidance, and rules of behavior specifically designed for CDX.
• The current security assessment report conducted for CDX.

We respectfully note that the OIG is authorized by the Inspector General Act of 1978, as amended, to have timely access to personnel and all materials necessary to complete its objectives. Similarly, EPA Manual 6500, Functions and Activities of the Office of Inspector General (1994), requires that each EPA employee cooperate with and fully disclose information to the OIG. Also, Administrator Michael S. Regan, in an April 28, 2021 email message to EPA employees, conveyed his “expectation that EPA personnel provide OIG timely access to records or other information” and observed that “full cooperation with the OIG is in the best interest of the public we serve.” We will request that you immediately resolve the situation if an Agency employee or contractor refuses to provide requested materials 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.

We will post this memorandum on our public website at www.epa.gov/oig.

cc: Janet McCabe, Deputy Administrator
    Dan Utech, Chief of Staff, Office of the Administrator
    Jon Monger, Associate Deputy Administrator
    Wesley J. Carpenter, Deputy Chief of Staff, Office of the Administrator
    Vaughn Noga, Deputy Assistant Administrator for Environmental Information and Chief
    Information Officer, Office of Mission Support
    Tonya Manning, Director and Chief Information Security Officer, Office of Information
    Security and Privacy, Office of Mission Support
    Daniela Wojtalewicz, Audit Follow-up Coordinator, Office of Mission Support
    Susan Perkins, Agency Follow-Up Coordinator
    Andrew LeBlanc, Agency Follow-Up Coordinator
    José Kercado, Backup Agency Follow-up Coordinator
    Lindsay Hamilton, Associate Administrator for Public Affairs
    Lance McCluney, Director, Office of Administrative and Executive Services, Office of
    the Administrator
    Regional Audit Follow-up Coordinators, Regions 1-10
    Sean W. O’Donnell, Inspector General
    Nicole N. Murley, Acting Deputy Inspector General
    Benjamin May, Counsel to the Inspector General
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    Lori Hoffman, Congressional and Media Liaison, Office of Inspector General