



U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL



# EPA OIG's Compliance With EPA Passport Guidance

Report No. 14-B-0244

May 1, 2014



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about the EPA OIG.

## Report Contributors:

Jean Bloom  
Kevin Collins

## Abbreviations

CFR	Code of Federal Regulations
EPA	U.S. Environmental Protection Agency
OIG	Office of Inspector General
OITA	Office of International and Tribal Affairs
PII	Personally identifiable information

### Hotline

To report fraud, waste or abuse, contact us through one of the following methods:

**email:** [OIG\\_Hotline@epa.gov](mailto:OIG_Hotline@epa.gov)  
**phone:** 1-888-546-8740  
**fax:** 1-202-566-2599  
**online:** <http://www.epa.gov/oig/hotline.htm>

**write:** EPA Inspector General Hotline  
1200 Pennsylvania Avenue, NW  
Mailcode 2431T  
Washington, DC 20460

### Suggestions for Audits or Evaluations

To make suggestions for audits or evaluations, contact us through one of the following methods:

**email:** [OIG\\_WEBCOMMENTS@epa.gov](mailto:OIG_WEBCOMMENTS@epa.gov)  
**phone:** 1-202-566-2391  
**fax:** 1-202-566-2599  
**online:** [http://www.epa.gov/oig/contact.html#Full\\_Info](http://www.epa.gov/oig/contact.html#Full_Info)

**write:** EPA Inspector General  
1200 Pennsylvania Avenue, NW  
Mailcode 2410T  
Washington, DC 20460



# At a Glance

## Why We Did This Review

On August 27, 2013, a member of the U.S. Senate Committee on Environment and Public Works requested that the U.S. Environmental Protection Agency (EPA), Office of Inspector General (OIG), initiate work in connection with a fraud committed by John C. Beale, a former Senior Policy Advisor with the EPA's Office of Air and Radiation. One of the areas audited was the agency's vetting process for new employees. We also audited the process for official passports. The audit disclosed issues that impact the OIG and require immediate attention.

**This report addresses the following EPA theme:**

- *Embracing EPA as a high performing organization.*

For further information, contact our public affairs office at (202) 566-2391.

The full report is at:  
[www.epa.gov/oig/reports/2014/20140501-14-B-0244.pdf](http://www.epa.gov/oig/reports/2014/20140501-14-B-0244.pdf)

## EPA OIG's Compliance With EPA Passport Guidance

### What We Found

The EPA OIG is not in compliance with EPA guidance governing the control and security of official passports issued to OIG employees. The total number of OIG employees with an official passport is unknown.

**The EPA OIG needs to ensure that it complies with EPA passport guidance to protect sensitive PII.**

The OIG does not have any policies and procedures associated with official passports (i.e., the issuance, control and security of official passports). The conditions occurred due to a lack of knowledge within the OIG concerning official passport requirements, and a lack of guidance and oversight from the OIG and the EPA's Office of International and Tribal Affairs (OITA). The lack of compliance with OITA guidance may put the OIG in the position where sensitive personally identifiable information (PII) is not being adequately protected. The lack of control could also result in the release of sensitive PII due to missing, misused or improperly destroyed official passports.

### Recommendations

We recommend that the OIG identify all official passports issued to OIG employees and request that all official passports be returned to the OITA for proper storage or cancellation. We also recommend that the OIG provide the OITA with the names and available passport numbers of OIG employees whose passports have not been located, and request that the OITA notify the U.S. Department of State. In addition, we recommend that the OIG develop and implement one OIG-wide policy and procedure for the issuance and control of official passports and designate an international travel coordinator position.



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

OFFICE OF  
INSPECTOR GENERAL

May 1, 2014

**MEMORANDUM**

**SUBJECT:** EPA OIG's Compliance With EPA Passport Guidance  
Report No. 14-B-0244

**FROM:** Kevin Christensen, Acting Assistant Inspector General  
Office of Audit

A handwritten signature in black ink, appearing to read "Kevin Christensen".

**TO:** Charles Sheehan, Deputy Inspector General

As part of our continuing work on internal controls as a result of the John Beale investigation, we initiated an audit of the U.S. Environmental Protection Agency's internal controls over passport security. We identified issues that impact the Office of Inspector General (OIG) and require immediate attention.

**Action Required**

Please provide a written response to this report within 60 calendar days. You should include planned corrective actions and completion dates for the recommendations. Your response will be posted on the OIG's public website, along with our memorandum commenting on your response. Your response should be provided as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended. If your response contains data that you do not want released to the public, you should identify the data for redaction or removal, along with corresponding justification. We will post this report to our website at <http://www.epa.gov/oig>.

If you have any questions, please contact me at (202) 566-1007 or [christensen.kevin@epa.gov](mailto:christensen.kevin@epa.gov); or Robert Adachi, Director of Forensic Audits, at (415) 947-4537 or [adachi.robert@epa.gov](mailto:adachi.robert@epa.gov).

U.S. Environmental Protection Agency

# Office of Inspector General

- EPA OIG's Compliance  
With EPA Passport Guidance
- Report No. 14-B-0244  
May 1, 2014

# Reasons for Review

- Part of continuing work on internal controls in response to a member of the U.S. Senate Committee on Environmental and Public Works request for work in connection with a fraud committed by John C. Beale.
- As part of an audit of the U.S. Environmental Protection Agency's (EPA's) vetting process for new employees, we looked into the EPA's vetting of official passports.
- Issues have been identified that impact the Office of Inspector General (OIG) and require immediate attention.

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# Scope and Methodology

Performed fieldwork from February 3 through March 19, 2014.

- Conducted assignment in accordance with generally accepted government auditing standards issued by the Comptroller General of the United States.
- Sought to determine whether the OIG had policies and procedures associated with official passports.
- Met with OIG Chief of Staff and Deputy Assistant Inspector General for Investigations.

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# Scope and Methodology (cont'd.)

- Reviewed the EPA's Office of International and Tribal Affairs (OITA) universe of official passports to determine the number of OIG personnel issued an official passport.
- Requested that OIG's Office of Audit, Office of Program Evaluation and Office of Investigations identify OIG staff most likely to have an official passport.
- Contacted some current OIG employees and one prior OIG employee identified as being issued an official passport.
- Conducted an audit of the agency's passport controls and will issue a separate report about the results.

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# Criteria–Official Passport

- The Code of Federal Regulations, under 22 CFR 51.3 (b), provides:

An official passport is issued to an official or employee of the U.S. Government traveling abroad to carry out official duties.

- Under 22 CFR 51.52 (b) and (b)(1), official passports are exempt from fees when the individual is:

An officer or employee of the United States traveling on official business.... The applicant must submit evidence of the official purpose of the travel.

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# Criteria–Passport Acceptance Agents

- Under 22 CFR 51.22 (b)(5), the U.S. Department of State is authorized to select an employee of a federal agency to accept passport applications on its behalf.
  
- Within the EPA, four employees have been designated as passport acceptance agents:
  - Two are in the OITA.
  - Two are in EPA Region 5.

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# Sensitive Personally Identifiable Information

- OITA website provides the following guidance:

Official passports are controlled United States Government documents and must be returned between trips to the Travel Office of the Office of International and Tribal Affairs (OITA). **Please return your official passport to OITA within 15 days after returning to the United States.** When not in use for travel, all official passports will be maintained in a secure facility within OITA.

**All official passports must be forwarded to OITA for immediate cancellation:** if you retire; if you accept employment elsewhere (even if at another government agency); or if you move to another position within EPA that does not require official travel.

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# Sensitive Personally Identifiable Information (cont'd.)

- Official passports are sensitive personally identifiable information (PII).
- EPA Privacy Policy 2151.0 defines sensitive PII as:  
*Social Security numbers, or comparable identification numbers...*  
Sensitive PII, a subset of PII, requires additional levels of security controls.
- OIG Policy 413 states:  
Users must store hard copies of sensitive PII in locked file cabinets and limit access to only individuals who are authorized to use the information.

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# Results

- We found the OIG is not in compliance with EPA guidance over the control and security of official passports issued to OIG employees.
- The total number of OIG employees with an official passport is unknown.
- The OIG does not have any policies and procedures associated with official passports (i.e., the issuance, control and security of official passports).

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# How Did This Happen?

- Lack of knowledge within the OIG concerning official passport requirements.
- Lack of guidance and oversight from the OITA and the OIG.

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# Why Is This Important?

- Lack of compliance with OITA guidance may put the OIG in the position where sensitive PII is not being adequately protected.
- Lack of control could result in the release of sensitive PII due to missing, misused or improperly destroyed official passports.

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# Total OIG Official Passports Unknown

- OIG has no record of who was issued an official passport or the passport's status.

Official passports identified	Current employees	Former employees	Total
Official passports held by OIG employees and identified as an OIG employee by OITA	3	2	5
Official passports held by OIG employees and identified as an employee in an agency office by OITA	4	1	5
Official passports not in OITA records provided	0	1	1
<b>TOTAL</b>	<b>7</b>	<b>4</b>	<b>11</b>

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# Location of Official Passports

- OIG has no record of the location of official passports issued. According to the OITA:

Location of passport*	Current employees	Former employees	Total
OITA Possession**	3	1	4
Traveler	4	2	6
Unknown	0	1	1
<b>TOTAL</b>	<b>7</b>	<b>4</b>	<b>11</b>

\* Locations is based upon OITA records.

\*\* Location in OITA records denotes passport as being in OITA possession.

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# OIG Official Passports Unknown

Based on information provided:

- We could not determine how many employees came to and left the OIG since OITA began compiling its records.
- We could not determine how many employees obtained an official passport.
- We could not determine whether additional OIG employees are identified as being part of other EPA offices in the universe provided by OITA.

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# Lack of Policies and Procedures

- OIG does not have any policies and procedures for the issuance and control of official passports.
- OIG's Office of Investigations is in the process of preparing a policy and procedure for official passports issued to its employees (that proposed procedure would not be applicable to the OIG as a whole).

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# Lack of International Travel Coordinator

- There is no international travel coordinator within the OIG.
- The most recent OIG international travel coordinator retired over 2 years ago.
- The international travel coordinator is the initial contact when developing an international travel plan and provides instruction to travelers on obtaining official passports.
- The Fast International Approval Tracking database indicated three OIG employees could have traveled internationally without having an official passport. U.S. Department of State policy says federal government employees on official international travel must travel with their official passport.

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# Official Passport Issuance

- Any future requests for an official passport should be approved by the Inspector General prior to contacting the OITA.
  - One official passport was issued in 2013 without the approval of OIG management. Employee followed instructions provided by the OITA and paid a fee for the official passport.
  - Payment of a fee defeats the benefit of an official, no-fee passport.

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# Control and Security of Official Passports for Current OIG Employees

- All official passports need to be returned to the OITA consistent with its guidelines.
- According to the information provided by the OITA, seven current OIG employees have official passports.
  - Four passports are in the possession of the employees.
  - Three passports are with the OITA.
- Two official passports could not be located in the OITA's safe.
  - Both passport were in the possession of the employees.

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# Proper Disposal of Official Passports

- Official passports for employees leaving the OIG need to be returned to the OITA. Guidelines for passport return are posted on the OITA website.
- We identified three employees who left the OIG with an official passport.
  - We were able to contact only one former employee, who stated that he returned his official passport when he left the OIG. However, there is no record that the official passport was ever received or disposed of in accordance with OITA guidelines.

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# Proper Disposal of Official Passports (cont'd.)

- OIG guidance in place at the initiation of audit fieldwork did not include any information concerning official passports for employees leaving the OIG.
- A new separation and clearance procedure dated February 27, 2014, was added to the OIG Intranet. The new procedure requires:
  - a. The OIG Office of Human Resources be made aware of its responsibility to contact the OITA Passport Office when an OIG employee is planning to separate from employment.
  - b. The OITA to confirm whether an official passport was issued to the separating employee.
- The new procedure was not disseminated OIG-wide.

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# Recommendations

- We recommend that the Deputy Inspector General:
  1. Identify official passports issued to OIG employees.
  2. Request that all official passports be returned to the OITA for proper storage or cancellation.
  3. Provide the OITA with the names and available passport numbers of OIG employees whose passports have not been located, and request that the OITA notify the U.S. Department of State.

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# Recommendations (cont'd.)

4. Develop and implement one OIG-wide policy and procedure to include, at a minimum:
  - a. Designation of an international travel coordinator position and a description of the coordinator's function and responsibilities.
  - b. Procedures for requesting an official passport.
  - c. A requirement that all OIG personnel traveling outside of the United States on official government business obtain an official passport prior to traveling.
  - d. A requirement that upon completion of travel the official passport be returned in accordance with OITA guidelines.

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# **Status of Recommendations and Potential Monetary Benefits**

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status <sup>1</sup>	Action Official	Planned Completion Date	Claimed Amount	Agreed To Amount
1	21	Identify official passports issued to OIG employees.	O	Deputy Inspector General			
2	21	Request that all official passports be returned to the OITA for proper storage or cancellation.	O	Deputy Inspector General			
3	21	Provide the OITA with the names and available passport numbers of OIG employees whose passports have not been located, and request that the OITA notify the U.S. Department of State.	O	Deputy Inspector General			
4	22	Develop and implement one OIG-wide policy and procedure to include, at a minimum: <ul style="list-style-type: none"> <li>a. Designation of an international travel coordinator position and a description of the coordinator's function and responsibilities.</li> <li>b. Procedures for requesting an official passport.</li> <li>c. A requirement that all OIG personnel traveling outside of the United States on official government business obtain an official passport prior to traveling.</li> <li>d. A requirement that upon completion of travel the official passport be returned in accordance with OITA guidelines.</li> </ul>	O	Deputy Inspector General			

<sup>1</sup> O = Recommendation is open with agreed-to corrective actions pending.  
C = Recommendation is closed with all agreed-to actions completed.  
U = Recommendation is unresolved with resolution efforts in progress.

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