



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

DEC 22 2011

DEPUTY ADMINISTRATOR

**MEMORANDUM**

**SUBJECT:** Response to Early Warning Report 11-P-0722

**FROM:** Bob Perciasepe

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**TO:** Arthur A. Elkins Jr., Inspector General

I am pleased to offer the U.S. Environmental Protection Agency's response to the September 29, 2011, Office of Inspector General report 11-P-0722, *EPA Should Prepare and Distribute Security Classification Guides*. The report recommends that the Administrator ensure:

- The preparation, review and approval of appropriate security-classification guides that conform to the requirements of Executive Order 13526, *Classified National Security Information* and the EPA's *National Security Information Handbook*; and
- The distribution of classification guides to users of the EPA's originally classified information and to program offices that work in related subject areas.

The EPA continues to believe that the current EPA procedures for managing classified materials are within the intent of Executive Order 13526. The Information Security Oversight Office, which oversees the governmentwide security-classification system and the National Industrial Security Program, informed the agency that:

While the exact letter of the Order seems to suggest that all agencies granted OCA authority by the President must have classification guides, there is still room for judgement and common sense. In our view, looking at the program and its activity in its entirety, EPA's program is fully functioning and has the appropriate checks and balances in place to ensure that its classification program is consistent and effective.

In consultation with the Office of Homeland Security, the Office of Administration and Resources Management and the Office of General Counsel, we have determined that these recommendations are helpful in light of evolving information-sharing initiatives for classified EPA products. The agency will implement them beginning with an initial classification guide that addresses materials most recently originally classified. This guide will be developed within 90 days from the date of this response, with distribution subsequent to the Administrator's approval. If this initial guide does not fully encompass the other classified materials, we will develop additional guides as necessary.

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