



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

MAY 2 2012

THE INSPECTOR GENERAL

MEMORANDUM

SUBJECT: Evaluation of Agency Response to OIG Report No. 11-P-0722, *EPA Should Prepare and Distribute Security Classification Guides*, September 29, 2011

TO: Bob Perciasepe
Deputy Administrator

Thank you for your April 5, 2012, follow-up response to the subject report and the actions taken, ongoing, and planned since the report was issued.

You have agreed to implement the two recommendations in the report. Your response states that one classification guide, intended as the derivative guidance for the most recent original classification decision—made on January 21, 2011—is complete and will be distributed upon the Administrator's approval.

For the six original classification decisions made by previous Administrators, the Agency intends to implement Executive Order 13526, Section 1.9, and conduct a deliberative review of these previous decisions. Your response states that additional guides may be developed as part of this review. However, there is no commitment to complete these classification guides and no date specified by which these additional guides will be developed, though you explained that the process will take more than 90 days. In addition, your response states that when any of EPA's originally classified documents are shared with interagency partners, a document-specific classification guide will accompany the classified document. However, you do not mention what sort of classification guide, if any, will be prepared for derivative classifiers working within EPA itself. EPA employees working with the six previous original classification decisions will also need derivative guidance, such as may be found in a classification guide.

We are aware that EPA must report to the Information Security Oversight Office by June 27, 2012, on the results of its fundamental classification guidance review. Since the Administrator has not yet approved the initial classification guidance, and EPA cannot make a determination regarding additional classification guides until such time as it reports to the Information Security Oversight Office, we are holding recommendations 1 and 2 in abeyance. Both recommendations will be held in abeyance pending (1) the distribution of the initial classification guide to users of EPA's most recent originally classified information; (2) a determination by EPA on the development of additional classification guides, including

milestones dates for distribution, as applicable; and (3) a determination of what EPA will prepare for derivative classifiers working within EPA.

Attached is a copy of your memorandum. In accordance with OIG policy, we will periodically follow up to determine how well the Agency's ongoing and planned actions have addressed the recommendations. If you or your staff have any questions, please contact Elizabeth Grossman, Acting Assistant Inspector General for Program Evaluation, at (202) 566-0832, or Eric Lewis at (202) 566-2664.



Arthur A. Elkins, Jr.

Attachment

- cc: Craig Hooks, Assistant Administrator for Administration and Resources Management
Debbie Dietrich, Associate Administrator for Homeland Security
Barbara Bennett, Agency Follow-Up Official (Chief Financial Officer)
Bernadette Dunn, Agency Follow-Up Coordinator
Scott Fulton, General Counsel
Sandy Womack, Audit Follow-Up Coordinator, Office of Administration and Resources Management
Renee Page, Director, Office of Administration, Office of Administration and Resources Management
Elizabeth Grossman, Acting Assistant Inspector General for Program Evaluation, Office of Inspector General
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