



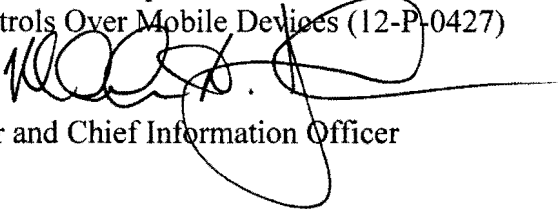
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JUL 19 2012

OFFICE OF  
ENVIRONMENTAL INFORMATION

**MEMORANDUM**

**SUBJECT:** OEI's Response to OIG's Final Report – Office of Environmental Information  
Should Strengthen Controls Over Mobile Devices (12-P-0427)

**FROM:** Malcolm D. Jackson   
Assistant Administrator and Chief Information Officer

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

In response to the final Audit Report, "Office of Environmental Information Should Strengthen Controls Over Mobile Devices, Project Number 12-P-0427", the Office of Environmental Information is pleased to provide you with our Corrective Action Plan (CAP) to the OIG recommendations found in the report.

If you have any questions, please contact James McDonald, Acting Director, Office of Planning, Resources, and Outreach, at (202) 566-0959.

Attachment

cc: James McDonald  
Robbie Young  
Scott Dockum

**Office of Environmental Information  
Corrective Action Plan**

<p><b>Auditing Group:</b> OIG  <b>Audit No.:</b> 12-P-0427  <b>Report Date:</b> April 25, 2012  <b>OEI Lead Office:</b> OPRO and OTOP  <b>CAP Due Date:</b> July 23, 2012</p>	<p><b>Audit Title:</b> Office of Environmental Information Should Strengthen Controls Over Mobile Devices  <b>OEI Lead and Phone:</b> ORPO/P2DS Scott Dockum 202-566-1914, OTOP Anne Mangiafico 202-564-9483, RMS Laura Palmer 202-564-0726</p>
---	---

Recommendation	Corrective Action	Planned Completion Date	Status
<p><b>1a:</b> SOPs should: Require custodial officers to, on a quarterly basis, verify/confirm the accuracy of eBusiness information on MD user registration and Utilization.</p>	<p>Develop Mobile Device Management SOP which requires custodial officers in conjunction with eBusiness Account Managers to, on a quarterly basis, verify the accuracy of eBusiness information matching MD user registration and device information. If the information is inaccurate, SOP will require updates to correct the information, and property be handled following processes outlined in EPA's Custodial Officer Guide.</p>	4/10/2013	Concur
<p><b>1b:</b> SOPs should: Develop standardized business case justifications for issuing an MD that supervisors can utilize. Require supervisors to review justifications annually.</p>	<p>Develop Mobile Device Management SOP and follow OEI's newly produced, Mobile Device Management Plan. The SOP will include steps that require consideration of standardized business case justifications by an employee's supervisor prior to MD issuance. OEI's Mobile Device Management Plan requires quarterly certification from each OEI Office Director as to the business need for each MD in the organization.</p>	4/10/2013	Concur
<p><b>1c:</b> SOPs should: Develop an appropriate MD upgrade and</p>	<p>1c-1: Recommend/communicate via established communication sources (i.e., WCF monthly reports, etc.) that WCF customers should use the</p>	1c-1: Completed	Concur

replacement schedule consistent with the industry standard for upgrading wireless devices that includes conditions and justifications for approving upgrades sooner than the standard.	zero cost equipment option when replacing mobile devices.  1c-2: Provide information for inclusion in the Agency Mobile Device and Wireless procedure when finalized.	1c-2: 12/31/2012	
<b>1d:</b> SOPs should: Address the number and type of MD accessories that may be purchased, and require custodial officers to track accessory costs.	Develop Mobile Device Management SOP. SOP will include standardized accessories list and require supervisory approval prior to issuance of any accessory that is not included within the original packaging of the MD.	4/10/2013	Concur
<b>1e:</b> SOPs should: Include standard procedures for addressing inappropriate use of an MD, including consequences.	The SOP will include a section that references the EPA ORDER 3120.1 - Conduct and Discipline Order and the EPA OHR Conduct and Discipline Manual.  The SOP will outline a process to use the Order and manual as a guide to determine appropriate consequences when inappropriate use of a MD is determined.	4/10/2013	Concur
<b>1f:</b> SOPs should: Develop eBusiness design changes that would trigger the system to notify account managers when a predetermined cost threshold is reached, which may indicate potentially inappropriate	A report will be added to the eBusiness report suite that will allow customers to review Mobile Device information for data and cell usage. It will be up to the customers to monitor their own usage and make Mobile Device decisions based on their respective office and Agency policies.	7/19/2012	Concur

use of an MD.			
<b>1g:</b> SOPs should: Allow approved users to possess either a cell phone or a BlackBerry, or require additional documented justification and annual review if an employee requires multiple devices.	Develop Mobile Device Management SOP which will outline steps to implement a process by which a justification is shown for each MD issued, including multiple devices for a single user. These justifications will receive quarterly review and certification by OEI Office Directors to OEI's Senior Information Officer (SIO) as required by OEI's Mobile Device Management Plan.	4/10/2013	Concur
<b>1h:</b> SOPs should: Review the business need for MD users with low utilization of their monthly plan minute allotments (less than 1, 10, 20, and 30 percent utilization as described in EPA's Mobile Device Service Review and Optimization Analysis) and terminate service where appropriate.	Develop Mobile Device Management SOP which will outline steps to implement a quarterly process to review zero usage devices and determine if termination is appropriate. However, the SOP will only focus on zero usage devices and business justifications to determine whether a device might be terminated.	4/10/2013	Concur
<b>1i:</b> SOPs should: Require end users to notify their property staff when they no longer need a device, transfer to another EPA program office, or leave the Agency. Instruct end users on the proper procedure for turning in their MDs.	OEI will update the Provisioning/ Deprovisioning SOP to include references to the Mobile Device Management SOP and vice versa, to ensure that custodial officers and eBusiness Account managers take steps to notify users of this responsibility.	4/10/2013	Concur
<b>2a:</b> Follow up with OEI	Update Provisioning/ Deprovisioning SOP and	4/10/2013	Concur

<p>managers and determine: Whether there is a valid business case justification for those staff using multiple MDs, and determine whether one of the devices should be returned to the Agency.</p>	<p>refer to MD SOP which will outline steps to implement a process by which a justification is shown for each MD issued, including multiple devices for a single user. These justifications will receive quarterly review and certification by OEI Office Directors to OEI's Senior Information Officer (SIO) as required by OEI's Mobile Device Management Plan.</p>		
<p><b>2b:</b> Follow up with OEI managers and determine: Whether the international calls made during January–June 2011 by the remaining 17 OEI employees and contractors we identified in our sample of 27 were inappropriate, and take action based on SOPs developed per recommendation 1.</p>	<p>OEI supervisors will review the OIG list of identified OEI employees that was provided on April 3, 2012 and determine if disciplinary actions are needed.</p> <p>Appropriate actions will be based on the review of EPA ORDER 3120.1 - Conduct and Discipline Order, the EPA OHR Conduct and Discipline Manual and consultation with Labor Employee Relations.</p>	<p>10/05/2012</p>	<p>Concur</p>
<p><b>3:</b> Finalize Agency-wide draft domestic and international MD procedures and develop other Agency-wide procedures as necessary that consider SOPs that encompass the areas listed in recommendation 1.</p>	<p>Finalize the draft Mobile Device and Wireless Procedure (Domestic)</p> <p>Finalize the draft Mobile Device and Wireless Procedure (International)</p>	<p>12/31/2012</p> <p>11/1/2012</p>	<p>Concur</p>