

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

AUG 14 2012

THE INSPECTOR GENERAL

MEMORANDUM

SUBJECT: OEI Response to OIG Report: Office of Environmental Information

Should Strengthen Controls Over Mobile Devices, Report No. 12-P-0427,

Issued April 25, 2012

TO: Malcolm D. Jackson

Assistant Administrator for Environmental Information

and Chief Information Officer

We have reviewed your July 19, 2012, response to the subject report. Your response states that you concur with the recommendations and have provided a corrective action plan with milestones for completion. We agree with the planned corrective actions and included our evaluation of the proposed actions as Attachment 1. As such, we are closing this report in our audit tracking system. Please track implementation of your corrective actions in the Agency's Management Audit Tracking System until completed.

If you or your staff have questions, please contact Melissa Heist, Assistant Inspector General for Audit, at (202) 566-0899 or heist.melissa@epa.gov; or Patrick Gilbride, Director, Risk Assessment and Program Performance Audits, at (303) 312-6969 or heist.melissa@epa.gov; or Patrick Gilbride, Director, Risk Assessment and Program Performance Audits, at (303) 312-6969 or heist.melissa@epa.gov; or Patrick Gilbride, Director, Risk Assessment and Program Performance Audits, at (303) 312-6969 or heist.melissa@epa.gov; or Patrick Gilbride, Director, Risk Assessment and Program Performance Audits, at (303) 312-6969 or heist.melissa@epa.gov;

Arthur A. Elkins Jr.

Attachment

cc:

Melissa Heist James McDonald

Robbie Young Scott Dockum

OIG	Agency Action(s)	OIG Analysis	-
Recommendation	Taken, Ongoing, or Planned		Status
1a: Require custodial officers to, on a quarterly basis, verify/confirm the accuracy of eBusiness information on MD user registration and utilization.	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 mobile device (MD) user registration and device information. If the information is inaccurate, the SOP will require updates to correct the information, and property will be handled following processes outlined in EPA's Custodial Officer Guide. Planned completion date is 04/10/2013.	We accept the Office of Environmental Information's (OEI's) corrective action plan.	Closed
1b: Develop standardized business case justifications for issuing an MD that supervisors can utilize. Require supervisors to review justifications annually.	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. Planned completion date is 04/10/2013.	We accept OEI's corrective action plan.	Closed
1c: Develop an appropriate MD upgrade and replacement schedule consistent with the industry standard for upgrading wireless devices that includes conditions and justifications for approving upgrades	1c- 1: Recommend/communicate via established communication sources (i.e., WCF monthly reports, etc.) that WCF customers should use the zero cost equipment option when replacing mobile devices. Ic- 2: Provide information for inclusion in the Agency Mobile Device and Wireless procedure when finalized. Planned completion date is 12/31/2012.	We accept OEI's corrective action plan. We accept OEI's corrective action plan.	Closed
sooner than the standard.			
1d: 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. Planned completion date is 04/10/2013.	We accept OEI's corrective action plan.	Closed
1e: 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. Planned completion date is	We accept OEI's corrective action plan.	Closed

OIG Recommendation	Agency Action(s) Taken, Ongoing, or Planned	OIG Analysis	Status
1f: 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 use of an MD.	A report will be added to the eBusiness report suite that will allow customers to review MD information for data and cell usage. It will be up to the customers to monitor their own usage and make MD decisions based on their respective office and Agency policies. Planned completion date is 07/19/2012.	We accept OEI's corrective action plan.	Closed
1g: 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. Planned completion date is 04/10/2013.	We accept OEI's corrective action plan.	Closed
1h: 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. Planned completion date is 04/10/2013.	We accept OEI's corrective action plan.	Closed
1i: 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. Planned completion date is 04/10/2013.	We accept OEI's corrective action plan.	Closed
2a: 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.	Update Provisioning/Deprovisioning SOP and 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. Planned completion date is 04/10/2013.	We accept OEI's corrective action plan.	Closed

OIG Recommendation	Agency Action(s) Taken, Ongoing, or Planned	OIG Analysis	Status
2b: 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.	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. 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. Planned completion date is 10/05/12.	We accept OEI's corrective action plan.	Closed
3: Finalize Agency-wide draft domestic and international MD procedures and develop	Finalize the draft Mobile Device and Wireless Procedure (Domestic). Planned completion date is 12/31/2012.	We accept OEI's corrective action plan.	Closed
other Agency-wide procedures as necessary that consider SOPs that encompass the areas listed in recommendation 1.	Finalize the draft Mobile Device and Wireless Procedure (International). Planned completion date is 11/2/2012.	We accept OEI's corrective action plan.	Closed