



# At a Glance

*Catalyst for Improving the Environment*

## Why We Did This Review

We performed this review in response to an anonymous hotline complaint alleging mismanagement of the Institutional Controls Tracking System (ICTS) project being developed by the Office of Superfund Remediation and Technology Innovation (OSRTI).

## Background

In 2003, the U.S. Environmental Protection Agency's (EPA's) Superfund program acquired a contract to develop ICTS to make information available via the Internet. In 2005, OSRTI purchased a Task Order under a different contractor to continue ICTS development. System Life Cycle Management guidance outlines EPA's system development requirements. The procedures require that a project have a System Management Plan that serves as the primary managerial document to control, assess, and document the system.

**For further information, contact our Office of Congressional, Public Affairs and Management at (202) 566-2391.**

**To view the full report, click on the following link:**  
[www.epa.gov/oig/reports/2009/20090325-09-P-0128.pdf](http://www.epa.gov/oig/reports/2009/20090325-09-P-0128.pdf)

## ***Lack of Project Plan Resulted in Transition and Contractor Performance Problems for the Institutional Controls Tracking System***

### **What We Found**

Lack of compliance with established project management procedures resulted in transitional problems in 2005 that delayed ICTS development and negatively affected contractor performance. Although we could not substantiate the mismanagement claims alleged in the hotline complaint, the absence of key decision documents and significant turnover of key ICTS personnel could have contributed to the complainant's perception that ICTS project decisions were made in a haphazard manner. Had OSRTI documented its key decisions, as required by EPA guidance, institutional documents would have been available to answer communication and project questions that impacted the ICTS project.

In April 2006, OSRTI assigned a certified project manager to oversee ICTS development. The project manager took steps to develop a System Management Plan for ICTS and provided leadership and direction to help OSRTI overcome challenges with contractor transitions. In 2007, OSRTI merged ICTS with the Superfund Document Management System (SDMS). More work is needed to ensure that OSRTI documents its processes for overseeing system development activities and conducting quality management reviews to ensure the System Management Plan is kept current.

### **What We Recommend**

We recommend that the Director, Office of Superfund Remediation and Technology Innovation, Office of Solid Waste and Emergency Response:

- Document procedures for overseeing development activities for the SDMS project as prescribed by EPA System Life Cycle Management guidance.
- Conduct and document a review of SDMS system documentation to ensure the document is current. If needed, direct the contractor to update the documentation.
- Create a Plan of Actions and Milestones in EPA's Automated Security Self Evaluation and Remediation Tracking system for the above two recommendations.

We met with OSRTI to discuss the report's findings. OSRTI agreed with the report's recommendations, and provided a complete corrective action plan to address the report's recommendations. OSRTI management indicated that some elements of the report did not provide the current operational status of the ICTS application or the appropriate timeframe of the weaknesses found, and we modified the report as appropriate to address management's concerns.