



U.S. ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF INSPECTOR GENERAL

*Catalyst for Improving the Environment*

## Audit Report

# EPA Needs to Improve Physical Security at Its Offices in Las Vegas, Nevada

Report No. 10-P-0059

February 3, 2010



**Report Contributors:**

Rudolph M. Brevard  
Charles M. Dade

**Abbreviations**

EPA	U.S. Environmental Protection Agency
LVFC	Las Vegas Finance Center
OIG	Office of Inspector General
ORD	Office of Research and Development

**Cover photo:** An EPA building in Las Vegas that is protected by a card reader system.  
(EPA photo)



# At a Glance

*Catalyst for Improving the Environment*

## Why We Did This Review

The Office of Inspector General (OIG) sought to determine whether the U.S. Environmental Protection Agency (EPA) implemented oversight practices for securing access to key EPA locations in Las Vegas, Nevada.

## Background

EPA occupies space in six buildings on or near the University of Nevada-Las Vegas campus. These buildings use a card access system to control personnel access to these buildings. The Office of Research and Development (ORD) is responsible for managing the process for authorizing and removing personnel access to these buildings and for administering the computer system that controls the card access system. EPA's Security Management Division within the Office of Administration and Resources Management is the responsible and primary agent within EPA for physical security.

**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/2010/20100203-10-P-0059.pdf](http://www.epa.gov/oig/reports/2010/20100203-10-P-0059.pdf)

## ***EPA Needs to Improve Physical Security at Its Offices in Las Vegas, Nevada***

### **What We Found**

EPA needs to improve physical security at its Las Vegas facilities. The Las Vegas Finance Center's (LVFC's) server room and other key areas are susceptible to unauthorized access by personnel not a part of LVFC. The LVFC areas are protected by an access control system, but the system operator – ORD – does not administer the system in a manner that allows LVFC to monitor access to its area. As a result, ORD granted personnel access to sensitive LVFC areas without proper authorization.

During our audit of EPA's financial statements, we found that these problems are not limited to the LVFC. ORD does not administer the system in a manner that permits the other organizations in Las Vegas supported by the system to monitor access to their space. Also, ORD did not perform its responsibilities associated with managing and administering the computer-controlled card access system supporting all of the EPA buildings in Las Vegas.

During subsequent communications with ORD, the office agreed with the findings and indicated that it planned to negotiate the transfer of the responsibility for the maintenance and oversight of the portion of the card access system relied upon by the other offices within Las Vegas to one of the other offices.

### **What We Recommend**

We recommend that the ORD Office of Science Information Management develop and implement procedures to ensure that all organizations are provided with the information necessary to monitor and review the access to their space until one of the offices accepts responsibility for oversight and maintenance of the card access system. Until ORD completes the transfer, we recommend that each Las Vegas office develop and implement a formal procedure that ensures it reviews the access reports provided by ORD for anomalies on at least a monthly basis.

Once one of the offices accepts the responsibility from ORD, we recommend that the office develop and implement a formal procedure for managing the card access system under its control. After the transfer, we recommend that each of the offices establish a formal procedure for reviewing and monitoring the access for the space used by their office. We also recommend that the Security Management Division conduct an assessment of the physical security practices at EPA's Las Vegas locations and conduct outreach to the Las Vegas offices to provide assistance. EPA agreed with the findings and recommendations.



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

OFFICE OF  
INSPECTOR GENERAL

February 3, 2010

**MEMORANDUM**

**SUBJECT:** EPA Needs to Improve Physical Security at Its Offices in  
Las Vegas, Nevada  
Report No. 10-P-0059

**FROM:** Rudolph M. Brevard  
Director, Information Resources Management Assessments  
Office of Inspector General

*Rudolph M. Brevard*

**TO:** See Below

This is our report on the subject audit conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final EPA position. Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

The estimated cost of this report – calculated by multiplying the project's staff days by the applicable daily full cost billing rates in effect at the time – is \$49,122.

**Action Required**

In accordance with EPA Manual 2750, you are required to provide a written response to this report within 90 calendar days. Due to the number of offices involved, EPA's Security Management Division within the Office of Administration and Resources Management has been designated as the lead office responsible for coordinating a consolidated response to this report. You should include a corrective actions plan for agreed-upon actions, including milestone dates. We have no objections to the further release of this report to the public. This report will be available at <http://www.epa.gov/oig>.

If you or your staff have any questions regarding this report, please contact me at (202) 566-0893 or [brevard.rudy@epa.gov](mailto:brevard.rudy@epa.gov); or Charles Dade, Project Manager, at (202) 566-2575 or [dade.chuck@epa.gov](mailto:dade.chuck@epa.gov).

**Addressees:**

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Office of Air and Radiation

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**Purpose**

The Office of Inspector General (OIG) sought to determine whether the U.S. Environmental Protection Agency (EPA) implemented oversight practices for securing access to key EPA locations in Las Vegas, Nevada. We looked at these security issues during our review of EPA’s consolidated financial statements for Fiscal Years 2009 and 2008.

**Background**

EPA occupies space in six buildings on or near the University of Nevada-Las Vegas campus. Several EPA programs with diverse functions occupy these buildings. Details are in Table 1.

**Table 1: EPA Las Vegas Offices and Functions**

Office	Program Office	Function
<b>Las Vegas Finance Center</b>	Office of the Chief Financial Officer	Supports payments for all of EPA’s grant award offices. Supports the fellowship program by making all fellowship payments and providing additional services such as maintaining completion of studies and payment enrollments.
<b>Human Resources Management Division – Las Vegas</b>	Office of Administration and Resources Management	Processes personnel and benefits actions for the Agency’s 17,000 employees. One of EPA’s three human resources shared service centers.
<b>National Exposure Research Laboratory</b>	Office of Research and Development	Conducts research, development, and technology transfer programs on environmental exposures to ecological and human receptors.
<b>Radiation and Indoor Environments National Laboratory</b>	Office of Air and Radiation	Protects the public and the environment by minimizing exposure to radiation and indoor air pollution through environmental measurements, applied technologies, and education.
<b>Environmental Response Team – West</b>	Office of Solid Waste and Emergency Response	Provides assistance in environmental emergencies. Serves as in-house consultant on innovative and emerging technologies and has recognized experts in several fields of science.

Source: EPA Office of Environmental Information Intranet.

The EPA Las Vegas offices use a card access system to control entry to these buildings. The Office of Research and Development (ORD) is responsible for managing the process for authorizing and removing personnel access to these buildings. ORD is also responsible for administering the computer system that controls the card access system.

The *Standard Operating Procedure for Management/Control of Access to Environmental Protection Agency Buildings in Las Vegas, NV*, dated February 17, 2004, requires ORD’s Environmental Sciences Division Programs Operations Staff to: (1) grant access to EPA Las Vegas facilities based on the fully completed submission of an employee data sheet form LV-172 with all appropriate signatures, (2) perform semiannual reviews of all access provided, and (3) perform a review of the signatures on the LV-172 whenever the access requirements of a staff member changes.

EPA Order 3210, *Physical Security Program*, designates the Security Management Division within the Office of Administration and Resources Management as the responsible and primary agent within EPA for physical security. The order requires the division to conduct periodic nationwide physical security risk and vulnerability assessments of EPA facilities.

## Scope and Methodology

We performed this audit from June through November 2009 at EPA offices in Las Vegas, Nevada. We performed this audit in accordance with generally accepted government auditing standards. These standards require that we plan and perform the audit to obtain sufficient and appropriate evidence to provide a reasonable basis for our findings and conclusions based on the audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions.

We interviewed EPA officials responsible for overseeing the administration of the Las Vegas card reader system and managing the Las Vegas buildings access processes. We interviewed EPA officials responsible for using the card access system reports to monitor personnel access they oversee. We reviewed the Standard Operating Procedures that govern the maintenance and oversight of the card reader system. We analyzed the card reader system reports provided by EPA officials within Las Vegas. We reviewed forms Las Vegas offices use to request personnel access to their building space.

We had not performed past audits of physical security at EPA Las Vegas offices. Therefore, we did not perform follow-up work on any open recommendations.

## Results of Review

EPA needs to improve physical security at its Las Vegas facilities. In particular, the Las Vegas Finance Center's (LVFC's) server room and other key areas are susceptible to unauthorized access by personnel not a part of LVFC. The LVFC areas are protected by an access control system, but the system operator – ORD – does not administer the system in a manner that allows LVFC to monitor access to its area. In particular, ORD had not obtained authorization from the LVFC Director to grant access to key areas to non-LVFC personnel. ORD also had neither provided the LVFC reports detailing who has access to their areas nor performed the required semiannual review of access rights required by ORD procedures. As a result, personnel were granted access to sensitive areas without proper authorization. Problems are not limited to the LVFC. ORD does not administer the system in a manner that permits the other EPA organizations supported by the system to monitor access to their space.

ORD did not perform its responsibilities associated with managing and administering the computer-controlled card access system supporting all of the EPA buildings in Las Vegas. The ORD personnel now responsible for this function work within ORD's Office of Science Information Management. We found that ORD:

- Did not grant access based on appropriately approved and completed LV-172 forms. Our review of access to a small sample of doors for which the LVFC Director was a required approving official disclosed personnel with access whose forms were not approved by the LVFC Director.
- Did not fully complete the LV-172 forms we reviewed.
- Did not perform the required semiannual reviews of the card access provided. ORD indicated that the only review performed was back in 2004, and even for that review it could not provide evidence that the review was performed or that any corrective actions were taken based on the review.

Along with not performing the responsibilities identified above, ORD has not been providing the necessary information to the various EPA organizations serviced by the card access system to allow them to monitor and review the access to their space. Radiation and Indoor Environments, Human Resources, and LVFC all indicated that ORD has not provided them with the information necessary to validate personnel who have access to their space. We also found that ORD was not responsive to the offices supported by the card access system. The LVFC Information Security Officer mentioned in a report that she attempted to review the access granted within the card access system but found that the reports provided by ORD were not accurate and complete and that the responses to her requests were not timely. To enable each organization to properly monitor and review the access to its space, ORD needs to provide the following standard reports to each organization on a monthly basis:

- A report showing all of the access groups in Las Vegas that lists for each group (1) each of the doors the group can access, and (2) the days of the week and times that the group can access each of the doors.
- A report showing all of the access groups in Las Vegas that lists all of the users, their associated card ID, and the expiration date of the access for each of the users for each group.
- For reviewing the logged history of users' access, a report that shows the: (1) criteria used for the creation of the report, (2) date and time of the access attempt, (3) action taken by the device, (4) location/site, (5) door, (6) user name, and (7) card ID.

Additionally, ORD needs to be responsive to the organizations' special requests for reports and provide them in a timely manner.

During subsequent communications with ORD, the office agreed with the finding and indicated that it planned to negotiate the transfer of the responsibility for the maintenance and oversight of the portion of the card access system relied upon by the other offices within Las Vegas to one of the other offices. Because this transfer of responsibility will result in a change in the way EPA will be providing physical security to the facilities in Las Vegas, we believe it would be in EPA's best interest for the Office of Administration and Resources Management's Security Management Division to conduct a review to ensure the procedures are implemented and working as management intends. Furthermore, in response to the draft report, offices within Las Vegas felt the Security Management Division should have involvement with ensuring security responsibilities are appropriately transferred within the Las Vegas offices.

## Recommendations

We recommend that the Director, Office of Science Information Management, within the Office of Research and Development:

1. Develop and implement procedures to ensure that all organizations are provided with the information necessary to monitor and review the access to their space both if and when the transfer takes place as well as in the interim until the transfer takes place, including:
  - a. Providing electronic copies of the following reports to the director of each organization supported by the system on a monthly basis to enable them to monitor and review the access to their space.
    - i. A Standard Report showing **all** of the access groups in Las Vegas that lists for each group:
      1. Each of the doors the group can access, and
      2. The days of the week and times that the group can access each of the doors.
    - ii. A Standard Report showing **all** of the access groups in Las Vegas that lists **all** of the users, their associated Card ID, and the expiration date of the access for each of the users for each group.
    - iii. For reviewing the logged history of users' access, a standard report that shows the: (1) criteria used for the creation of the report, (2) date and time of the access attempt, (3) action taken by the device, (4) location/site, (5) door, (6) user name, and (7) card ID.
  - b. Providing, upon request, the reports as requested by the organizations in a timely manner (within 2 working days) for special situations.
2. Fully implement the standard operating procedures for the facilities that remain in the card access system for the National Exposure Research Laboratory, Environmental Sciences Division
3. Perform a review to ensure the standard operating procedures are implemented and working and document the review, associated results, and corrective actions taken.

For the (a) Director, Las Vegas Finance Center, within the Office of the Chief Financial Officer; (b) Director, Human Resources Management Division – Las Vegas, within the Office of Administration and Resources Management; (c) Director, Environmental Response Team – West, within the Office of Solid Waste and Emergency Response; and (d) Director, Radiation and Indoor Environments National Laboratory, within the Office of Air and Radiation, we recommend that:

4. If your office accepts the transfer of the responsibility for management and oversight of the card access system, develop and implement formal procedures for managing and overseeing the card access system for all of the facilities/organizations supported by the system. The procedures should include:

- a. Listing steps for granting and removing access to the system.
  - b. Providing on a monthly basis the reports noted in Recommendation 1 to the director for each organization supported by the system,
  - c. Providing, upon request, the reports as requested by the organizations in a timely manner (within 2 working days) for special situations.
  - d. Performing periodic reviews to validate
    - i. the access provided is limited to the access authorized and
    - ii. the access authorized is still needed.
5. Develop and implement a formal procedure to review for anomalies, on a monthly basis, the logs and access reports provided by the Office of Science Information Management, within the Office of Research and Development, that are associated with the current card access system for the space used by its office.
  6. Once responsibility for overseeing the card access system is transferred, develop and implement a formal procedure for reviewing and monitoring the access for the space used by its office. The procedure should include continuing to review system logs and reports on a monthly basis for anomalies, as well as verifying at least annually that all users associated with the office space still need their current access.

We recommend the Director, Security Management Division, within the Office of Administration and Resources Management:

7. Schedule and conduct an assessment of the physical security practices at EPA's Las Vegas locations to make sure the procedures are implemented and working as management intends.
8. Conduct outreach to EPA offices within Las Vegas and provide technical assistance, as required, to ensure security responsibilities and practices meet Agency requirements.

## **Agency Response and OIG Comments**

The Agency agreed with our findings and provided tentative corrective action plans to address our recommendations. However, we noted the offices indicated differences in when they felt the transfer of the responsibility for management and oversight of the card access system would occur. ORD estimated that the transfer would take place on July 31, 2010, whereas the other offices estimated it would take place no later than March 31, 2010.

ORD indicated that in December 2009 it implemented corrective actions that address Recommendation 1. The corrective actions described appear to address our concerns and we closed this recommendation in our audit tracking system.

We also noted that the Security Management Division will schedule and conduct its assessment upon notification that the offices have completed the procedures required in response to Recommendations 1 through 6.

Additionally, both the (a) Human Resources Management Division – Las Vegas, within the Office of Administration and Resources Management, and the (b) Radiation and Indoor Environments National Laboratory, within the Office of Air and Radiation requested that the Security Management Division be involved, provide technical advice, and assist with the transfer and implementation of the door access system into the LaPlaza offices.

We believe that EPA should have one lead office serve as the coordinator for ensuring the redistribution of security responsibilities at its Las Vegas offices. This should help to ensure each office's planned corrective actions are properly aligned and that all agreed-to actions are tracked through completion. We request that the EPA's Security Management Division, the primary agent within EPA for physical security, coordinate the final consolidated response to this report and the division agreed to do so. We also modified the report to request that the Security Management Division conduct outreach to those Las Vegas offices that need assistance in establishing security practices and the division agreed to do so.

Appendices A through F contain the complete responses provided by each office.

# Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status <sup>1</sup>	Action Official	Planned Completion Date	Claimed Amount	Agreed To Amount
1	4	Develop and implement procedures to ensure that all organizations are provided with the information necessary to monitor and review the access to their space both if and when the transfer takes place as well as in the interim until the transfer takes place, including: <ul style="list-style-type: none"> <li>a. Providing electronic copies of the following reports to the director of each organization supported by the system on a monthly basis to enable them to monitor and review the access to its space.                             <ul style="list-style-type: none"> <li>i. A Standard Report showing all of the access groups in Las Vegas that lists for each group:                                     <ul style="list-style-type: none"> <li>1. Each of the doors the group can access, and</li> <li>2. The days of the week and times that the group can access each of the doors.</li> </ul> </li> <li>ii. A Standard Report showing all of the access groups in Las Vegas that lists all of the users, their associated Card ID, and the expiration date of the access for each of the users for each group.</li> <li>iii. For reviewing the logged history of users' access, a standard report that shows the: (1) criteria used for the creation of the report, (2) date and time of the access attempt, (3) action taken by the device, (4) location/site, (5) door, (6) user name, and (7) card ID.</li> </ul> </li> <li>b. Providing, upon request, the reports as requested by the organizations in a timely manner (within 2 working days) for special situations.</li> </ul>	O	Director, National Exposure Research Laboratory, Environmental Sciences Division, within Office of Research and Development			
2	4	Fully implement the standard operating procedures for the facilities that remain in the card access system for the National Exposure Research Laboratory, Environmental Sciences Division	O	Director, National Exposure Research Laboratory, Environmental Sciences Division, within Office of Research and Development			
3	4	Perform a review to ensure the standard operating procedures are implemented and working and document the review, associated results, and corrective actions taken.	O	Director, National Exposure Research Laboratory, Environmental Sciences Division, within Office of Research and Development			

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status <sup>1</sup>	Action Official	Planned Completion Date	Claimed Amount	Agreed To Amount
4	4	If your office accepts the transfer of the responsibility for management and oversight of the card access system, develop and implement formal procedures for managing and overseeing the card access system for all of the facilities/organizations supported by the system. The procedures should include: a. Listing steps for granting and removing access to the system. b. Providing on a monthly basis the reports noted in Recommendation 1 to the director for each organization supported by the system, c. Providing, upon request, the reports as requested by the organizations in a timely manner (within 2 working days) for special situations. d. Performing periodic reviews to validate i. the access provided is limited to the access authorized and ii. the access authorized is still needed.	O	(a) Director, Las Vegas Finance Center, within Office of the Chief Financial Officer; (b) Director, Human Resources Management Division – Las Vegas, within Office of Administration and Resources Management; (c) Director, Environmental Response Team – West, within Office of Solid Waste and Emergency Response; and (d) Director, Radiation and Indoor Environments National Laboratory, within Office of Air and Radiation			
5	5	Develop and implement a formal procedure to review for anomalies, on a monthly basis, the logs and access reports provided by the Office of Science Information Management, within the Office of Research and Development, that are associated with the current card access system for the space used by its office.	O	(a) Director, Las Vegas Finance Center, within Office of the Chief Financial Officer; (b) Director, Human Resources Management Division – Las Vegas, within Office of Administration and Resources Management; (c) Director, Environmental Response Team – West, within Office of Solid Waste and Emergency Response; and (d) Director, Radiation and Indoor Environments National Laboratory, within Office of Air and Radiation			
6	5	Once responsibility for overseeing the card access system is transferred, develop and implement a formal procedure for reviewing and monitoring the access for the space used by its office. The procedure should include continuing to review system logs and reports on a monthly basis for anomalies, as well as verifying at least annually that all users associated with the office space still need their current access.	O	(a) Director, Las Vegas Finance Center, within Office of the Chief Financial Officer; (b) Director, Human Resources Management Division – Las Vegas, within Office of Administration and Resources Management; (c) Director, Environmental Response Team – West, within Office of Solid Waste and Emergency Response; and (d) Director, Radiation and Indoor Environments National Laboratory, within Office of Air and Radiation			
7	5	Schedule and conduct an assessment of the physical security practices at EPA's Las Vegas locations to make sure the procedures are implemented and working as management intends.	O	Director, Security Management Division, within Office of Administration and Resources Management			
8	5	Conduct outreach to EPA offices within Las Vegas and provide technical assistance, as required, to ensure security responsibilities and practices meet Agency requirements.	O	Director, Security Management Division, within Office of Administration and Resources Management			

<sup>1</sup> O = recommendation is open with agreed-to corrective actions pending  
C = recommendation is closed with all agreed-to actions completed  
U = recommendation is undecided with resolution efforts in progress

## Appendix A

## ***Response from Office of Research and Development***

January 8, 2010

### **MEMORANDUM**

**SUBJECT:** Response and Corrective Action Plan For OIG Draft Report  
Entitled: "EPA Needs to Improve Physical Security at Its Offices in Las Vegas,  
Nevada" Assignment No. OA-FY09-0842

**FROM:** Daniel Heggem /s/ *Daniel T. Heggem*  
Acting Director, Environmental Sciences Division  
National Exposure Research Laboratory  
Office of Research and Development

Jack Puzak /s/ *Christopher S. Robbins for*  
Director, Office of Science Information Management  
Office of Research and Development

**TO:** Rudolph M. Brevard, Director  
Information Resources Management Assessments  
Office of Inspector General

Thank you for the opportunity to review and comment on the subject draft report. We generally agree with the findings contained in the draft report and are taking steps to address each of the three recommendations.

As previously stated in our response to the position paper, since the creation of the 2004 Standard Operating Procedure (SOP) for card access referenced in the IG report, the number and location of EPA staff in Las Vegas has increased significantly at the off-campus La Plaza facility. On campus EPA staff includes ORD and a few OAR lab staff. Therefore, we believe that the AA-ships (OSWER, OARM, OCFO, and OAR) located off-campus on Maryland Parkway, should make minor modifications to their existing system and operate and maintain access control independently of ORD's system. During the last Las Vegas Directors' meeting, local management from the other AAships agreed on this approach and a contract action has

been initiated to establish a separate access system. With this in mind, we plan to address the OIG's recommendations by implementing the corrective actions set forth in the attachment and summarized below.

In addition, due to organizational and staffing changes within ORD, the recently established ORD "Office of Science Information Management" (OSIM) will have the primary responsibility for implementing the corrective actions described below. NERL/ESD management will work with staff in ORD/OSIM to facilitate implementation of the corrective actions.

**Recommendation 1:**

Develop and implement procedures to ensure that all organizations are provided with the information necessary to monitor and review the access to their space both if and when the transfer takes place as well as in the interim until the transfer takes place, including:

- a. Providing electronic copies of the following reports to the director of each organization supported by the system on a monthly basis to enable them to monitor and review the access to their space.
  - i. A Standard Report showing all of the access groups in Las Vegas that lists for each group:
    1. Each of the doors the group can access, and
    2. The days of the week and times that the group can access each of the doors.
  - ii. A Standard Report showing all of the access groups in Las Vegas that lists all of the users, their associated Card ID, and the expiration date of the access for each of the users for each group.
  - iii. For reviewing the logged history of users' access, a standard report that shows the: (1) criteria used for the creation of the report, (2) date and time of the access attempt, (3) action taken by the device, (4) location/site, (5) door, (6) user name, and (7) card ID.
- b. Providing, upon request, the reports as requested by the organizations in a timely manner (within 2 working days) for special situations.

**Corrective Action:**

We concur with the finding. As of December 2009, the procedures developed and contained in the existing SOP are being followed and implemented. Additionally, when the next quarterly co-located Directors' meeting is held, the NERL/ESD Division Director will confirm with the other directors that they are receiving the necessary reports. This process will continue until the other organizations have their stand-alone system. A contract action has been initiated to establish a separate card access system. The separate system is expected to be in place by July 31, 2010.

ORD/OSIM has distributed two reports entitled "User-all by access group" and "access group" to all Las Vegas Division Directors. These reports will continue to be distributed on a monthly basis. These Standard Reports show all of the access groups in Las Vegas and, for each group, list all OIG recommended information. These reports will continue to be distributed to all Division Directors until the transfer takes place at which time the report will be distributed to

only the ESD Division Director. All special reports “upon request” will be provided in a timely manner for special situations.

**Recommendation 2:**

Fully implement the standard operating procedures for the facilities that remain in the card access system for the National Exposure Research Laboratory, Environmental Sciences Division

**Corrective Action:**

We concur with the finding. The SOP will be fully implemented for the ESD-LV facility within 3 months of the completion of the transfer.

**Recommendation 3**

Perform a review to ensure the standard operating procedures are implemented and working and document the review, associated results, and corrective actions taken.

**Corrective Action:**

We concur with the finding. For the facilities that remain on the NERL/ESD card access system, we will perform a review within 6 months after the updated standard operating procedures are completed to ensure the procedures are being followed. The results of the review will be documented.

Thank you again for the opportunity to address the findings contained in the subject draft report. Please feel free to contact Chris Sibert at (702) 798-2234 if you have any questions.

Attachment

cc:

Jewel Morris

Marshall Gray

Christopher Sibert

Caroline Parton

Ardra Morgan Kelly

Rec. No.	OIG Recommendation	Responsible Office	Corrective Action	Planned Completion Date
1	<p>Develop and implement procedures to ensure that all organizations are provided with the information necessary to monitor and review the access to their space both if and when the transfer takes place as well as in the interim until the transfer takes place, including:</p> <p>a. Providing electronic copies of the following reports to the director of each organization supported by the system on a monthly basis to enable them to monitor and review the access to their space.</p> <p>i. A Standard Report showing all of the access groups in Las Vegas that lists for each group:</p> <ol style="list-style-type: none"> <li>1. Each of the doors the group can access, and</li> <li>2. The days of the week and times that the group can access each of the doors.</li> </ol> <p>ii. A Standard Report showing all of the access groups in Las Vegas that lists all of the users, their associated Card ID, and the expiration date of the access for each of the users for each group.</p> <p>iii. For reviewing the logged history of users' access, a standard report that shows the: (1) criteria used for the creation of the report, (2) date and time of the access attempt, (3) action taken by the device, (4) location/site, (5) door, (6) user name, and (7) card ID.</p> <p>b. Providing, upon request, the reports as requested by the organizations in a timely manner (within 2 working days) for special situations.</p>	ORD/OSIM	<p>We concur with the finding.</p> <p>As of December 2009, the procedures developed and contained in the existing SOP are being followed and implemented. Additionally, when the next quarterly co-located Directors' meeting is held, the NERL/ESD Division Director will confirm with the other directors that they are receiving the necessary reports. This process will continue until the other organizations have their stand-alone system. A contract action has been initiated to establish a separate card access system. The separate system is expected to be in place by July 31, 2010.</p> <p>ORD/OSIM has distributed two reports entitled "User-all by access group" and "access group" to all Las Vegas Division Directors. These reports will continue to be distributed on a monthly basis. These Standard Reports show all of the access groups in Las Vegas and, for each group, list all OIG recommended information. These reports will continue to be distributed to all Division Directors until the transfer takes place at which time the report will be distributed to only the ESD Division Director.</p> <p>All special reports "upon request" will be provided in a timely manner for special situations.</p>	Complete
2	Fully implement the standard operating procedures for the facilities that remain in the card access system for the National Exposure Research Laboratory, Environmental Sciences Division.	ORD/OSIM	We concur with the finding. The SOP will be fully implemented for the ESD-LV facility within 3 months of the completion of the transfer.	October 2010
3	Perform a review to ensure the standard operating procedures are implemented and working and document the review, associated results, and corrective actions taken.	ORD/OSIM	We concur with the finding. For the facilities that remain on the NERL/ESD card access system, we will perform a review within 6 months after the updated standard operating procedures are completed to ensure the procedures are being followed. The results of the review will be documented.	April 2011

## Appendix B

***Response from Las Vegas Finance Center***

January 7, 2010

**MEMORANDUM**

**SUBJECT:** Las Vegas Finance Center Response to OIG Draft Audit Report, “EPA Needs to Improve Physical Security at Its Offices in Las Vegas, Nevada,” Assignment No. OA-FY09-0842, dated December 11, 2009

**FROM:** Dany Lavergne, Director  
Las Vegas Finance Center

**TO:** Rudolph M. Brevard  
Director, Information Resources Management Assessments  
Office of Inspector General

Below is LVFC’s response to the subject Audit Report. We concur with all of the IG’s recommendations for LVFC and will implement the required corrective actions. Details on the recommendations pertaining to LVFC are provided below.

We appreciate the opportunity to review and comment on the draft report. If you have any questions or need additional information, please call me at (702) 798-2483.

**Recommendation #4:** If your office accepts the transfer of the responsibility for management and oversight of the card access system, develop and implement formal procedures for managing and overseeing the card access system for all of the facilities/organizations supported by the system.

**LVFC Response:** The EPA La Plaza offices are currently working with ORD to transfer management of the La Plaza card access system as quickly as possible; the target transfer date is no later than March 31, 2010. LVFC will work with the other La Plaza offices to ensure that formal procedures for management and oversight are completed within 90 days after the transfer.

**Recommendation #5:** Develop and implement a formal procedure to review for anomalies, on a monthly basis, the logs and access reports provided by the National Exposure Research

Laboratory, Environmental Sciences Division, that are associated with the current card access system for the space used by their office.

**LVFC Response:** LVFC currently has procedures for reviewing the logs and reports when they are received, but they are not formally documented. A formal procedure will be developed by January 29, 2010.

**Recommendation #6:** Once responsibility for overseeing the card access system is transferred, develop and implement a formal procedure for reviewing and monitoring the access for the space used by their office. The procedure should include continuing to review system logs and reports on a monthly basis for anomalies, as well as verifying at least annually that all users associated with the office space still need their current access.

**LVFC Response:** The EPA La Plaza offices are currently working with ORD to transfer management of the La Plaza card access system as quickly as possible; the target transfer date is no later than March 31, 2010. LVFC will develop and implement a procedure for reviewing and monitoring access to LVFC space within 90 days after the transfer.

cc: Raffael Stein  
Melvin Visnick  
Kechi Elliott  
Shelly Norland  
Peter Boudreau  
Charles Dade

## Appendix C

## ***Response from Human Resources Management Division – Las Vegas***

January 8, 2010

### **MEMORANDUM**

**SUBJECT:** Human Resources Management Division – Las Vegas Response to OIG Draft Audit Report, “EPA Needs to Improve Physical Security at Its Offices in Las Vegas, Nevada, Assignment No. OA-FY-09-0842, dated December 11, 2009

**FROM:** Sheron E. Johnson, Director  
Human Resources Management Division – Las Vegas

**TO:** Rudolph M. Brevard  
Director, Information Resources Management Assessments  
Office of Inspector General

Below is HRMD-LV response to the subject Audit Report. We concur with all of the IG’s recommendations for HRMD-LV and will implement the required corrective actions. Details on the recommendations pertaining to HRMD-LV are provided below.

We appreciate the opportunity to review and comment on the draft report. If you have any questions or need additional information, please call me at (702) 798-2413.

**Recommendation #4:** If your office accepts the transfer of the responsibility for management and oversight of the card access system, develop and implement formal procedures for managing and overseeing the card access system for all of the facilities/organizations supported by the system.

**HRMD-LV Response:** The EPA La Plaza offices are currently working with ORD to transfer management of the La Plaza card access system. The target date is no later than March 31, 2010. HRMD-LV will work with the other La Plaza offices to ensure that formal procedures for management and oversight are completed within 90 days after the transfer.

**Recommendation #5:** Develop and implement a formal procedure to review for anomalies, on a monthly basis, the logs and access reports provided by the National Exposure Research Laboratory, Environmental Sciences Division, that are associated with the current card access system for the space used by their office.

**HRMD-LV Response:** HRMD-LV has procedures for reviewing the logs and reports when they are received, but they are not formally documented. A formal procedure will be developed by January 29, 2010.

**Recommendation #6:** Once responsibility for overseeing the card access system is transferred, develop and implement a formal procedure for reviewing and monitoring the access for the space used by their office. The procedure should include continuing to review system logs and reports on a monthly basis for anomalies, as well as verifying at least annually that all users associated with the office space still need their current access.

**HRMD-LV Response:** The EPA La Plaza offices are currently working with ORD to transfer management of the La Plaza card access system as quickly as possible; the transfer date is no later than March 31, 2010. HRMD-LV will develop and implement a procedure for reviewing and monitoring access to the HRMD-LV space within 90 days after the transfer.

**Recommendation #7:** Schedule and conduct an assessment of the physical security practices at EPA's Las Vegas locations to make sure the procedures are implemented and working as management intends.

**HRMD-LV Response:** HRMD-LV would like for Security Management Division to be involved and assist with the migration of La Plaza Building A into a separate system that is managed by OAR/R&IE. The system should be integrated with the EPA Official Identification Card (EPASS). HRMD-LV would like for Security Management Division to provide technical advice, options for optimal service and performance, and guidance for becoming HSPD-12 compliant.

cc: Susan Kantrowitz  
Matt Crouch  
Marsha Bush  
Fernando Gomez  
Chuck Dade

## Appendix D

## ***Response from Environmental Response Team – West***

### **MEMORANDUM**

**SUBJECT:** Response to OIG Draft Audit Report, “EPA Needs to Improve Physical Security at Its Offices in Las Vegas, Nevada,” Assignment No. OA-FY09-0842, dated December 11, 2009 - from Environmental Response Team - West

**FROM:** Dennisses Valdés, Deputy Director  
Environmental Response Team-West

**TO:** Rudolph M. Brevard  
Director, Information Resources Management Assessments  
Office of Inspector General

We appreciate the opportunity to review and comment on the draft Audit Report. One correction needed in the report is the name of my organization. It is the *Environmental* Response Team. This is erroneously called emergency on pages 1,2,4, and three times on page 7.

We concur with the IG’s recommendations pertaining to ERT-W and will implement the required corrective actions. Below is the response to the ERT-W recommendations.

If you have any questions or need additional information, please call me at (702) 784-8003.

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**Recommendation #4:** If your office accepts the transfer of the responsibility for management and oversight of the card access system, develop and implement formal procedures for managing and overseeing the card access system for all of the facilities/organizations supported by the system.

**ERT-W Response:** The EPA La Plaza offices are currently working with ORD to transfer management of the La Plaza card access system as quickly as possible; the target transfer date is no later than March 31, 2010. ERT-W will work with the other EPA La Plaza offices to ensure that formal procedures for management and oversight are completed within 90 days after the transfer.

**Recommendation #5:** Develop and implement a formal procedure to review for anomalies, on a monthly basis, the logs and access reports provided by the National Exposure Research Laboratory, Environmental Sciences Division, that are associated with the current card access system for the space used by their office.

**ERT-W Response:** ERT-W currently reviews the logs and reports when they are received, procedures for the review are not formally documented. A formal procedure will be developed by January 29, 2010.

**Recommendation #6:** Once responsibility for overseeing the card access system is transferred, develop and implement a formal procedure for reviewing and monitoring the access for the space used by their office. The procedure should include continuing to review system logs and reports on a monthly basis for anomalies, as well as verifying at least annually that all users associated with the office space still need their current access.

**ERT-W Response:** The EPA La Plaza offices are currently working with ORD to transfer management of the EPA La Plaza portion of the card access system as quickly as possible; the target transfer date is no later than March 31, 2010. ERT-W, with the other EPA La Plaza offices, will develop and implement a procedure for reviewing and monitoring access to ERT-W space within 90 days of the transfer.

cc: Dany Lavergne, LVFC  
Jed Harrison, R&IE  
Sheron Johnsons, LVHRO  
Joe Lavergne, ERT-W  
Dave Wright, ERT

## Appendix E

## ***Response from Radiation and Indoor Environments National Laboratory***

January 11, 2010

### **MEMORANDUM**

**SUBJECT:** Radiation and Indoor Environments National Laboratory's Response to  
OIG Draft Audit Report, "EPA Needs to Improve Physical Security at Its Offices  
in Las Vegas, Nevada," Assignment No. OA-FY09-0842, dated December 11,  
2009

**FROM:** Jed Harrison, Director  
Radiation and Indoor Environments National Laboratory

**TO:** Rudolph M. Brevard  
Director, Information Resources Management Assessments  
Office of Inspector General

Below is R&IE's response to the subject Audit Report. We concur with all of the IG's recommendations for R&IE and will implement the required corrective actions. Details on the recommendations pertaining to R&IE are provided below.

We appreciate the opportunity to review and comment on the draft report. If you have any questions or need additional information, please call me at (702) 784-8220.

**Recommendation #4:** If your office accepts the transfer of the responsibility for management and oversight of the card access system, develop and implement formal procedures for managing and overseeing the card access system for all of the facilities/organizations supported by the system.

**R&IE Response:** The EPA La Plaza offices are currently working with ORD to transfer management of the La Plaza card access system as quickly as possible; the target transfer date is no later than March 31, 2010. R&IE will work with the other La Plaza offices to ensure that formal procedures for management and oversight are completed within 90 days after the transfer.

**Recommendation #5:** Develop and implement a formal procedure to review for anomalies, on a monthly basis, the logs and access reports provided by the National Exposure Research Laboratory, Environmental Sciences Division, that are associated with the current card access system for the space used by their office.

**R&IE Response:** R&IE currently has procedures for reviewing the logs and reports when they are received, but they are not formally documented. A formal procedure will be developed by January 29, 2010.

**Recommendation #6:** Once responsibility for overseeing the card access system is transferred, develop and implement a formal procedure for reviewing and monitoring the access for the space used by their office. The procedure should include continuing to review system logs and reports on a monthly basis for anomalies, as well as verifying at least annually that all users associated with the office space still need their current access.

**R&IE Response:** The EPA La Plaza offices are currently working with ORD to transfer management of the La Plaza card access system as quickly as possible; the target transfer date is no later than March 31, 2010. R&IE will develop and implement a procedure for reviewing and monitoring access to R&IE space within 90 days after the transfer.

**Recommendation #7:** Schedule and conduct an assessment of the physical security practices at EPA's Las Vegas locations to make sure the procedures are implemented and working as management intends.

**R&IE Response:** R&IE would like for Security Management Division to be involved and assist with the transfer and implementation of the Door Access System into the LaPlaza Office, including technical advice, options for optimal service and performance, guidance for becoming HSPD-12 compliant. Additionally, R&IE would like the Security Management Division to provide an assessment of Building E at LaPlaza, as well as assistance with aligning the Building E system with EPA IT procedures and protocols; and guidance in managing different systems that perform the same function or integrate into one system.

cc: Gina Costantino  
Andrea Sibert  
Fernando Gomez  
Dany Lavergne  
Dennisses Valdes  
Sheron Johnson

## Appendix F

***Response from Security Management Division***

January 8, 2010

**MEMORANDUM****SUBJECT:** Response to Draft Audit Report OA-FY09-0842**FROM:** Tami Franklin, Acting Director  
Security Management Division  
Office of Administration and Resources Management**TO:** Rudolph M. Brevard, Director  
Information Resources Management Assessments  
Office of Inspector General

Thank you for the opportunity to comment on the Office of Inspector General's Draft Audit Report ("Report") of December 11, 2009: "EPA Needs to Improve Physical Security at Its Offices in Las Vegas, Nevada."

The Security Management Division (SMD) concurs with the Report's recommendations and has no additional comments. Below is SMD's plan for completing Recommendation 7. Please note that specific completion dates for Recommendation 7 are dependent on completion of Recommendations 1-6 by other EPA organizations.

*Recommendation 7: "Schedule and conduct an assessment of the physical security practices at EPA's Las Vegas locations to make sure the procedures are implemented and working as management intends."*

SMD will schedule an assessment of the physical security practices at EPA's Las Vegas locations within 3 months of being notified that the procedures in Recommendations 1-6 of the Report have been completed. We will conduct the assessment to make sure the procedures are implemented and working as management intends within 6 months of being notified that the procedures in Recommendations 1-6 have been completed.

Again, we appreciate this opportunity to review the Report. If you have additional questions, please contact me at 202-564-9218.

**Appendix G*****Distribution***

Office of the Administrator  
Chief Financial Officer  
Assistant Administrator for Research and Development  
Assistant Administrator for Administration and Resources Management  
Assistant Administrator for Solid Waste and Emergency Response  
Assistant Administrator for Air and Radiation  
Director, Las Vegas Finance Center, Office of the Chief Financial Officer  
Acting Director, National Exposure Research Laboratory, Environmental Sciences Division,  
Office of Research and Development  
Director, Office of Science Information Management, Office of Research and Development  
Director, Human Resources Management Division – Las Vegas, Office of Administration and  
Resources Management  
Acting Director, Security Management Division, Office of Administration and  
Resources Management  
Deputy Director, Environmental Response Team – West, Office of Solid Waste and  
Emergency Response  
Director, Radiation and Indoor Environments National Laboratory, Office of Air and Radiation  
Agency Follow-up Official (the CFO)  
Agency Follow-up Coordinator  
General Counsel  
Associate Administrator for Congressional and Intergovernmental Relations  
Associate Administrator for Public Affairs  
Audit Follow-up Coordinator, Office of the Chief Financial Officer  
Audit Follow-up Coordinator, Office of Research and Development  
Audit Follow-up Coordinator, Office of Administration and Resources Management  
Audit Follow-up Coordinator, Office of Solid Waste and Emergency Response  
Audit Follow-up Coordinator, Office of Air and Radiation  
Acting Inspector General