




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

NOV 02 2015

OFFICE OF
ENVIRONMENTAL INFORMATION

MEMORANDUM

SUBJECT: Response to Office of Inspector General Final Report No.15-P-0292, "EPA Needs to Improve Recording Information Technology Investments and Issue a Policy Covering All Investments," dated September 22, 2015

FROM: Ann Dunkin
Chief Information Officer 

TO: Arthur A. Elkins, Jr.
Inspector General

Thank you for the opportunity to respond to the issues and recommendations in the subject audit report. Following is a summary of the agency's overall position. Although we have reached agreements on corrective actions, we still have concerns about comments in the report that we believe are not accurate.

AGENCY'S OVERALL POSITION:

While we agree with many of the comments that the OIG has made in this report, we believe there is still a fundamental misunderstanding of the purpose of the Registry of Environmental Applications and Data Warehouses (READ) tool. The READ database is designed to track all applications, data warehouses and models that meet the inclusion criteria. It was created to reduce data calls by providing a variety of information to OEI on an ongoing basis. Regions and program offices use READ to report their portfolio of applications, data warehouses and models. READ also collects information to allow certain EPA programs, such as Enterprise Architecture and Records programs, to track relevant information about applications for their programmatic needs.

READ was not designed to track the Agency's financial investments in Information Technology (IT). This information is instead managed and tracked through the budget and the Capital Planning and Investment Control (CPIC) process. Therefore, CPIC is the process by which the EPA manages individual investments.

To say that missing entries in READ would put "EPA at risk of not managing taxpayer dollars properly" is not accurate. While it is true that we intend to use READ as an aid in looking at the Agency's portfolio going forward, there are existing processes as part of the development lifecycle and the CPIC process, including evaluation by the Agency's IT Investment review board, that are expressly designed to ensure that the Agency makes the right investments and that they are properly managed.

The IG report makes a statement that "The EPA needs to require that its CPIC process include investments that are recorded in READ, provided they meet the READ inclusion criteria. The EPA does not review its registered systems in READ for any information that may be missing or not reported by program offices." This sentence should have been removed based on the information provided by OEI in response to the draft report.

As mentioned, READ has inclusion criteria and not all applications and models meet the required conditions for inclusion. Infrastructure investments, which are a collection of physical equipment, do not meet the criteria for inclusion in READ. Physical hardware is inventoried in a physical inventory database. If we include items that do not meet the READ inclusion criteria, we clutter the database and make it difficult for OEI or the regions and programs to use the database when information about applications, data warehouses and models is needed.

It is not accurate for the OIG report to say that the EPA reversed its stance on the inclusion of RSTI and TIM. RSTI was incorrectly added to READ. It is not the intention of the Agency that infrastructure investments be included. Upon review of READ, OEI staff were instructed to remove all infrastructure investments. OEI staff will work with regions and programs to accomplish this over the next several months.

OEI is concerned with the IG's interpretation of the definition of "an application or system" in reference to READ. While we have not always been precise in our terminology, we should be. READ includes applications, not systems. We should all be using the accurate definition of READ as a tool that includes applications, data warehouses and models. For READ, we define an application as: "a discrete set of elements or components (e.g., software or computer programs) organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information"

If you have any questions regarding this response, please contact Judi Maguire, OEI's Audit Follow-up Coordinator at maguire.judi@epa.gov or (202)564-7422.

cc: Rudy Brevard
Judi Maguire