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

OCT 11 2018

MEMORANDUM

SUBJECT: OIG Management Alert: "EPA Should Promptly Reassess Community Risk
Screening Tool" (Report No. 17-P-0378, September 7, 2017)

FROM: Jennifer Orme-Zavaleta
Principal Deputy Assistant Administrator for Science
Office of Research and Development

TO: Charles J. Sheehan
Acting Inspector General
Office of Inspector General

The purpose of this memorandum is to follow up on a previous response by the EPA's Office of
Research and Development (ORD) to the Inspector General (OIG) report entitled, *"EPA Should
Promptly Reassess Community Risk Screening Tool"* (Report No. 17-P-0378, September 7,
2017). Based on internal pragmatic decisions to redirect resources and end future development of
Community Risk Screening Tool (C-FERST), ORD is submitting an updated corrective action
plan for recommendations 1-3 in response to OIG Report No. 17-P-0378.

ORD has re-visited the originally proposed corrective action for Recommendation 1, which
directed ORD to "Review the Community-Focused Exposure and Risk Screening Tool and
develop an action plan with timeframes to address issues identified, including considerations on
whether to retain the tool." Initially, ORD identified plans to retain C-FERST, develop metrics
for measuring the tool's performance, establish a regular schedule for performance evaluations
and survey users to obtain feedback on tool utilization and improvements. ORD had already
initiated efforts to develop metrics and survey users before the final release of the OIG report and
continued these efforts after the report was released.

As ORD reviewed the next steps for C-FERST and the long-term resource requirements needed,
it was decided to end future development and utilization of the C-FERST tool and instead
incorporate unique aspects of C-FERST into other EPA tools (e.g., EnviroAtlas). C-FERST is
currently active and available; however, the tool and website will be archived at the end of the
calendar year once the aforementioned actions have been completed. ORD is using input and

feedback gathered through meetings with key stakeholders from within the Agency to identify features of C-FERST that are of most interest and utility, and to discuss plans for integrating these features into existing EPA tools. Once these actions are complete, the remaining pages of the C-FERST website will be archived.

Additionally, ORD has updated corrective actions to address recommendations 2 and 3. On August 29, 2018, ORD's Senior Information Official (SIO) instituted a required review via memorandum regarding the proposed development of software applications, which determines if the proposed application requires Agency-wide review and coordination. The application proposal is reviewed by ORD's Senior Information Technical Leader (SITL) and when necessary, other Agency SITLs. The ORD SITL/SIO then decides to either approve development, deny development or consult with the Agency Chief Information Officer. This process considers redundancy, reuse, cost, hosting needs, potential users, cybersecurity needs, and lifecycle of the application.

The attached list details a revised ORD Corrective Action Plan with the status and expected completion dates. We believe these steps satisfy the intent of the open recommendations and request the OIG consider open recommendations 1 and 3 as resolved with corrective actions pending, and close recommendation 2 with a completed corrective action.

If you have any questions, please contact Tim Watkins, Director, National Exposure Research Laboratory (NERL) at watkins.tim@epa.gov or Jerry Blancato, Director, Office of Science Information Management (OSIM) at Blancato.jerry@epa.gov .

Attachments

cc: Charles Sheehan, OIG
       Patrick Gilbride, OIG
       Erin Barnes-Weaver, OIG
       Tim Watkins, ORD/NERL
       Michael Slimak, ORD/SHC
       Jerry Blancato, ORD/OSIM
       Stefan Silzer, ORD/OPARM
       Deborah Heckman, ORD/OPARM
       Maureen Hingeley, ORD/OPARM
       Bob Trent, OCFO
       Michael Benton, OA

Attachment

Revised ORD Corrective Action Plan

Recommendation 1: Review the Community-Focused Exposure and Risk Screening Tool and develop an action plan with timeframes to address issues identified, including considerations on whether to retain the tool. If retained:

a. Develop metrics for measuring the tool's performance and establish a regular schedule for performance evaluations.
b. Survey users to obtain feedback on tool utilization and any needed improvements.

Original ORD Response: ORD agrees and since ORD does intend to retain this tool, we have provided responses to the additional recommendations below.

a. ORD has already initiated the development of performance metrics for C-FERST and other tools. ORD intended to have this be the topic for discussion and review by the BOSC which is now on hold pending appointment of new BOSC members. A completion date is therefore pending when the BOSC is formed and able to advise ORD on recommendations for appropriate metrics.

b. ORD agrees and as was mentioned in previous discussions with OIG, is partnering with ECOS (Environmental Council of States) and ASTHO (Association of State and Territorial Health Organizations) as part of an MOA established with EPA April 2016 to survey state agencies. (This survey is targeted for FY2018.)

Original Planned Completion Date: September 30, 2019

Updated ORD Response: ORD re-visited the originally proposed corrective action for Recommendation 1 and will no longer retain C-FERST. ORD initiated activities to identify unique aspects of C-FERST to be incorporated into other EPA tools. Once these actions are complete, the remaining pages of the C-FERST website and the tool itself will be archived.

Updated Planned Completion Date: June 30, 2019.

Recommendation 2: Develop policies and procedures for planning, developing, implementing and monitoring the performance of web-based research tools. Policies and procedures could build on the draft guidance for web-based tools developed by the National Exposure Research Laboratory, and should ensure that any new Office of Research and Development research tool stems from a clear project proposal that includes ongoing monitoring metrics and outcome measures, and vetting to ensure there is a need and no overlap with other tools.

Original ORD Response 2: ORD agrees and will work with OEI and the Chief Information Officer to develop criteria to determine when a research tool should be subject to the Agency's information technology requirements. ORD will use the criteria to review its new and existing major public interface research tools to determine the applicability of the Agency's information technology requirements. In addition, ORD will continue improving its investment portfolio

review process for IT investments as required under various laws, policies, and regulations including FITARA. ORD will expand its application development roadmap and checklist to require informing the Office of Science and Information Management (OSIM) before such projects are started and to report progress and expenditures on such development projects on a regular basis (at least annually or more frequent). OSIM will review and help the developers through the appropriate Life Cycle reviews throughout the project duration and ORD will regularly monitor performance of these web-based tools. This process is being developed and will be implemented starting FY 2018 and will be continuous.

Original Planned Completion Date: September 30, 2018

Updated ORD Response: On August 29, 2018, ORD's Senior Information Official (SIO) instituted a required review via memorandum regarding the proposed development of software applications, which determines if the proposed application requires Agency-wide review and coordination. If the proposal warrants agency review, it is first reviewed by ORD's Senior Information Technical Leaders (SITL) and when necessary, other Agency SITLs. The ORD SITL/SIO then decides to either approve development, deny development or consult with the Agency Chief Information Officer. The review evaluates, life cycle planning, redundancy with EPA and other applications, infrastructure and cybersecurity requirements, and relevancy to the mission.

Before an application is submitted to the SIO for review, ORD-OSIM reviews the applications to ensure the proposal meets the needs of the research program, potential clients and users. These reviews are conducted by following ORD's recently developed and published *Policies and Guidelines for Website and App Creation and Review process, a Road Map for Software Applications.* OSIM also made available an *IT Application Flow Chart, Roadmap, and Check List process* to guide software project managers and app developers in completing their application.

OSIM regularly meets with each laboratory, center, and office to review application development, infrastructure needs and approaches, including public facing applications for cost, expected future costs, value to customers, redundancy (within ORD and across the Agency), and obsolescence. These reviews combined with the application review and approval process cited above effectively enable ORD to identify and govern application development, maintenance, and retirement.

These processes were implemented in FY 2018. ORD is confident the actions described above successfully address recommendation 2.

Updated Completion Date: September 11, 2018

Recommendation 3: Review new and existing Office of Research and Development research tools to determine the applicability of the Agency's information technology requirements.

Response 3: ORD agrees and as stated in the response to recommendation #2: ORD will work with OEI and the Chief Information Officer to develop criteria to determine when a research tool should be subject to the Agency's information technology requirements. ORD will use the

4

criteria to review its new and major existing public interface research tools to determine the applicability of the Agency's information technology requirements.

Original Planned Completion Date: September 30, 2019

Updated ORD Response: ORD agrees, and as stated in the response to recommendation #2, ORD continues to work with OEI and the Chief Information Officer to develop criteria to determine when a research tool should be subject to the Agency's information technology requirements. OEI is implementing an Agency wide policy and process calling for Application Review and Approval. ORD worked closely with OEI in the development and implementation of the Agency policy. The CIO signed the Agency wide policy and implementation is forthcoming.

Planned Completion Date: September 30, 2019

ORD has no planned changes for addressing recommendation 4. Our actions are on-track to meet next September's due date.

Recommendation 4: Work with Agency offices responsible for other geospatial analysis tools to develop a decision-support matrix for when to use certain tools and for what purposes.

Response 4: ORD agrees that such a decision matrix is valuable and will work other offices, predominantly OEI on this effort. ORD has started to develop ORD-controlled tools and will coordinate with OEI for a wider review in 2017 and 2018, with a final assessment by 3/31/2019.

Original Planned Completion Date: September 30, 2019

Effective immediately, agency policy requires new software applications anticipated to have 10 or more users to be reviewed internally by the respective Program Office/Regional Senior Information Technology Leader (SITL). Jerry Blancato is the ORD SITL. He must approve before any funds are committed for acquisition of commercial products, contracted development/configuration services or EPA labor towards software development or configuration. In addition, this will require agency-level coordination and approval.

OSIM has incorporated this requirement into a streamlined application review/approval process and is positioned to support you throughout this new process to help avoid last minute introduction of unplanned review/approval steps and unanticipated delays. If you are contemplating development or acquisition of a new software application, contact your OSIM App Rep or Customer Service Rep who will coordinate a conversation with you and others in ORD to collect some basic information and lead you through the appropriate review and approval processes for your application. OSIM has developed an IT Application Flow Chart, RoadMap, and checklist process to guide software developers (or software project managers) throughout the entire lifecycle.

If you are interested in a more detailed discussion regarding this initiative, please feel free to contact Ann Vega (vega.ann@epa.gov) or Jacques Kapuscinski (kapuscinski.jacques@epa.gov) or if you have a general question, you can email the ORD Application Team Application_Integration_Team@epa.gov.

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