



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

OFFICE OF
INSPECTOR GENERAL

April 18, 2019

MEMORANDUM

SUBJECT: Evaluation of Response for Office of Inspector General Report No. 19-N-0085, *Management Alert: Destruction of a Document Used to Certify Security of EPA's Budget Formulation System*, Issued March 8, 2019

FROM: Kevin Christensen, Assistant Inspector General
Office of Audit and Evaluation

TO: Holly Greaves, Chief Financial Officer

Christensen for

Thank you for your March 22, 2019, written response and subsequent meeting on March 25, 2019, regarding this report. The Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA) continues to disagree with the Office of the Chief Financial Officer (OCFO) regarding this report. Statements by OCFO officials themselves confirm that an EPA staff member took notes during the agency review of the Budget Formulation System's FedRAMP Security Package—notes that were not provided to the OIG upon the OIG's request during the audit.

The Primary Information Security Officer stated that he annotated a spreadsheet to track that all inherited controls are in place for the cloud provider's environment hosting the EPA's Budget Formulation System, and that he subsequently destroyed the spreadsheet. Further, the Director of the OCFO's Office of Resource and Information Management stated:

When he [the Primary Information Security Officer] conducted the review, he checked the controls in the security package and ensured all inherited controls are in place, and then annotated an included spreadsheet to keep track.

Although you attempt to minimize OCFO annotations as "a few ticks or check marks," we consider any written indications of agency reviews to be notes required to be provided to the OIG upon request. The OIG maintains its initial position that the destruction of this information, at a minimum, limits and impedes the OIG's access to EPA information.

If you or your staff have any questions, please contact me at (202) 566-1007 or christensen.kevin@epa.gov; or Rudolph M. Brevard, Director, Information Resources Management, at (202) 566-0893 or brevard.rudy@epa.gov.

cc: Andrew Wheeler, Administrator
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