



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

JAN 17 2020

OFFICE OF MISSION SUPPORT

### MEMORANDUM

**SUBJECT:** Agency Response to Office of Inspector General Report No. 20-P-0007 "Management Alert: EPA Still Unable to Validate that Contractors Received Role-Based Training for Information Security Protection," dated October 21, 2019

**FROM:** *Wesley J. Carpenter*  
for Donna J. Vizian, Principal Deputy Assistant Administrator

**TO:** Charles J. Sheehan, Acting Inspector General

Thank you for the opportunity to respond to the issues and recommendations in the subject audit report. In response to Office of Inspector General recommendations 2 and 3, the Office of Mission Support has provided high-level intended corrective actions and estimated completion dates on the attached table.

If you have any questions for the Office of Mission Support regarding this response, please contact Kimberly Y. Patrick, Senior Procurement Executive and Director, Office of Acquisition Solutions, at (202) 564-4310.

Attachment

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**AGENCY'S RESPONSE TO REPORT RECOMMENDATIONS**

<b>No.</b>	<b>Recommendation</b>	<b>Assigned to:</b>	<b>High-Level Intended Corrective Actions</b>	<b>Estimated Completion</b>
2	Develop and implement internal controls to train EPA Contracting Officer's Representatives on mandatory role-based training requirements (i.e., EPA Acquisition Guide 39.1.2) that should be included in the EPA's information technology services contracts.	OMS	<p>OMS/OAS concurs with the recommendation to develop and implement internal controls to train EPA Contracting Officer's Representatives on mandatory role-based training requirements (i.e., EPA Acquisition Guide 39.1.2) that should be included in the EPA's information technology services contracts. OMS/OAS will use the existing Contracting Officer's Representative (COR) supplemental course within the OAS Acquisition Workforce Comprehensive Training Program to provide training on the acquisition policy requiring IT role-based training when appropriate for information technology services contractual agreements. Training coverage will emphasize the CORs' responsibility to 1) identify when role-based training is required in contractual agreements (i.e., when contractual agreements require EPA contractors to perform work that have significant information security responsibilities), and 2) include the requirement for role-based training in those respective agreements.</p> <p>Additionally, OMS-EI is currently developing new role-based training materials. Once completed, OMS/OAS will incorporate relevant materials from the newly developed OMS-EI role-based training into the enhanced OMS/OAS COR supplemental course.</p> <p>OMS/OAS will roll-out the enhanced OMS/OAS COR supplemental course by the estimated completion date, with subsequent course offerings as needed.</p>	February 29, 2020

No.	Recommendation	Assigned to:	High-Level Intended Corrective Actions	Estimated Completion
3	<p>Implement a plan to analyze the EPA’s information technology services contractual agreements initiated prior to EPA Acquisition Guide 39.1.2 to (a) determine how many of these agreements require modification to include role-based training requirements and (b) include the training requirements in the respective agreements.</p>	OMS	<p>OMS concurs with the recommendation to implement a plan to analyze the EPA’s information technology services contractual agreements initiated prior to EPA Acquisition Guide 39.1.2 to (a) determine how many of these agreements require modification to include role-based training requirements and (b) include the training requirements in the respective agreements.</p> <p>OMS will issue a memorandum to the Senior Resource Officials (SROs), Junior Resource Officials (JROs), OAS Division Directors, and Regional Acquisition Managers by January 28, 2020, requiring contracting officers in concert with program CORs and OMS/EI representatives, to review and analyze active information technology services contractual agreements, and ascertain that role-based training requirement is included when contractual agreements require EPA contractors to perform work that has significant information security responsibilities. Where language is discovered to be absent, contracting officers will modify the contracts to include role-based training requirement language. OMS will request that Senior Resource Officials (SROs) certify completion of the review, analysis, and inclusion of role-based training requirement language in IT contracts under their cognizance.</p>	April 10, 2020