



At a Glance

Catalyst for Improving the Environment

Why We Did This Review

We sought to determine to what extent the U.S. Environmental Protection Agency (EPA) took steps to prevent system control weaknesses in its current acquisition system from impacting the new replacement system. The Office of Inspector General contracted with Williams, Adley & Company, LLP, to conduct this review.

Background

The Integrated Contracts Management System (ICMS) supports the procurement needs of EPA offices. ICMS generates documents critical to the procurement process and recorded contract values totaling approximately \$17.5 billion for Fiscal Year 2008. EPA is replacing ICMS with a new system called the EPA Acquisition System (EAS).

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/2010/20100628-10-P-0160.pdf

Steps Needed to Prevent Prior Control Weaknesses From Affecting New Acquisition System

What Williams, Adley & Company, LLP, Found

Stronger system controls over ICMS need to be addressed prior to transitioning to the new EAS. Williams, Adley & Company, LLP, noted that:

- System reporting does not always accurately associate a procurement action with the correct user who initiated the action.
- ICMS does not have an audit log to capture and allow monitoring of security events.
- No formal ICMS user training exists.
- The ICMS Continuity of Operations Plan and system backup procedures are not compliant with federal requirements.
- ICMS generates procurement documents in a format such that changes to the procurement documents can be made outside of the ICMS processing environment.

While it may not be practical for EPA to address these weaknesses within ICMS, EPA should take proactive steps to strengthen its system controls so these similar weaknesses do not exist in EAS.

What Williams, Adley & Company, LLP, Recommends

Williams, Adley & Company, LLP, recommends that the Director, Office of Acquisition Management:

- Modify EAS reporting to associate procurements with the correct user who initiated the action.
- Implement EAS security logging; develop and implement a formal process for storing, reviewing, and reporting violations recorded in security logs.
- Continue EAS Contracting Officer training and Getting Started training for EAS users prior to obtaining system access.
- Ensure the EAS contingency site is remote from the primary hosting site.
- Implement system controls, such as proper tracking and version control of procurement documents, to prevent a user from altering procurement documents outside of the EAS environment.

On June 9, 2010, we met with EPA officials to discuss this briefing. Appendix A contains EPA's response to the findings.