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

DEC 17 2015

OFFICE OF WATER

MEMORANDUM

SUBJECT: Response to Office of Inspector General Final Report No. 15-P-0295 "Oversight of Cloud Services for OW's PMOS", dated September 24, 2015

FROM: Joel Beauvais
Acting Deputy Assistant Administrator

TO: Rudolph M. Brevard, Director
Information Resources Management Audits
Office of the Inspector General

Thank you for the opportunity to respond to the issues and recommendations in the subject audit report. The Office of Water agrees with recommendations 5 and 7. OW conditionally agrees with Recommendation 4 because we believe PMOS has all necessary controls as described in the intended corrective actions described below. However, once we receive information from the OIG about any additional specific controls that need to be addressed, we will work with OIG and OEI to address those controls and/or evaluate other alternatives based on cost and other criteria. Following is a summary of the Office of Water's intended corrective actions and estimated completion dates.

OFFICE OF WATER'S RESPONSE TO REPORT RECOMMENDATIONS

No.	Pg.	Recommendation	High-Level Intended Corrective Action(s)	Action Official	Status	Est. Complete by FY
4	9	Develop and implement an approved system authorization package (i.e., a risk assessment, System Security Plan, and Authorization to Operate), and perform annual security assessments for the PMOS application.	Based on OMB Circular A-130 and NIST 800-1, the application system (PMOS) has an agency approved Application Security Certification form which sets forth any and all requirements applicable for OW's PMOS system to operate. (See Attachment 1). The current OW PISO and the OEI PISO concur that this "minor" application system (PMOS) is categorized as "low" and does not require nor have in effect any omitted application specific controls that would	AA, OW	Open – Recommendation is open with conditionally agreed-to corrective actions pending.	05/2016 (estimated completion date if and when controls are provided)

No.	Pg.	Recommendation	High-Level Intended Corrective Action(s)	Action Official	Status	Est. Complete by FY
			require any additional system security authorizations (i.e., a risk assessment, System Security Plan, and Authorization to Operate). The security controls for this "minor" application are captured in the GSS security plan, based on OMB Circular A-130 and NIST 800-18. It is requested that if there are deficient controls found by the OIG that they be explicitly supplied to OEI/OW in order to review and comply.			
5	9	Perform a formal documented analysis to determine whether it would be more cost beneficial to either continue using PMOS; update ICIS to support the functions of the PMOS application; or develop a comprehensive application to replace PMOS, ICIS and similar applications associated with permitting used within the EPA.	Existing OMB eCPIC and Agency CIO SLCM reporting requirements, and internal OW IM/IT policy and procedures do not require a formal IT Alternatives Analysis to be produced unless the investment is classified as a CPIC Lite expenditure exceeding 250k annually. However, OW will still prepare an alternatives analysis using in-house resources that describes the business case for PMOS; why it cannot be currently integrated into ICIS; and prepare cost estimates for several alternatives and propose a recommendation to the IG.	AA, OW	Open - Recommendation is open with agreed-to corrective actions pending	02/2016
7	16	Perform and document a review to determine if the service provider's email services were used and move any emails that would be subject to FOIA requests or preserved in accordance with the EPA's Records Management Policy.	The contractor assisting in the management of PMOS, Avanti Corporation, contacted the old PMOS service provider and discovered email services were used in the old PMOS application. Upon further investigation of the application and emails we found that one email address was used by the service. The service was only used to send confirmations to users of their data edits in the system. Since September 2013 an Avanti email address has been copied on all emails sent through this service. The New PMOS application included Usersnap, a visual	AA, OW	Closed - All agreed-to actions completed.	10/2015

No.	Pg.	Recommendation	High-Level Intended Corrective Action(s)	Action Official	Status	Est. Complete by FY
			bug tracker, as a way to obtain feedback and address issues faster. Usersnap was only utilized once and has been removed from the application. Avanti has provided EPA with access to all existing historical emails, including those sent by the email services, and will continue to provide access to all emails regarding PMOS to EPA for at least five years from the time the emails are sent or received.			

CONTACT INFORMATION

If you have any questions regarding this response, please contact Sharon Gonder, Acting Director of OW's Project Management Office at (202) 564-5266 or Pravin Rana at (202) 564-1909.

Attachments

cc: Mike Shapiro
Albert Schmidt
Marilyn Ramos
Andrew Sawyers

Attachment 1 – additional information for Recommendation 4.

As per Federal guidance from NIST and OMB A-130 Appendix III:

- OW certifies that this application is in compliance with EPA standard configurations.
- OW certifies that the application is not defined as a "Major Application"
- OW certifies that the application does not store, process, or transmit information for which the FIPS-199 categorization is assessed as MODERATE or HIGH. The FIPS-199 categorizations are determined by considering the requirements for availability, integrity, and confidentiality according to NIST Special Publication 800-60 Rev.1, Guide for Mapping Types of Information and Information Systems to Security Categories
- OW agrees that the NCC has the authority to remove the application from production if the application adversely impacts the Central Production Environment or applications located on the same.
- OW PISO and OEI PISO have reviewed the NIST 800-53r4 controls and agree that the NCC GSS provides all the required controls for this Application/System; and, for those controls which are application specific or shared, the control has been documented appropriately. (PMOS has NO specific controls that meet this recommendation). The PMOS Application Certification Security Form was completed by the IMO, ISO, and SIO on 6/4/2014.