



U.S. ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF INSPECTOR GENERAL

***Hotline Report:  
Operating efficiently and effectively***

## **EPA Region 5 Needs to Better Protect Information Technology Property, and Areas for Agencywide Improvement Exist**

Report No. 18-P-0176

May 9, 2018



## Report Contributors:

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## Abbreviations

APMO	Agency Property Management Officer
CIO	Chief Information Officer
EPA	U.S. Environmental Protection Agency
GSA	General Services Administration
IT	Information Technology
OARM	Office of Administration and Resources Management
OEI	Office of Environmental Information
OIG	Office of Inspector General
OW	Office of Water
PAO	Property Accountable Officer
PARS	Performance Appraisal and Recognition System
PCO	Property Custodial Officer
PMO	Property Management Officer
PUO	Property Utilization Officer

**Cover Photos:** *Clockwise, from top left:* Region 5 excess cellphones; Region 2 laptops on pallets to be excessed; and Region 5 laptops not assigned and available as loaner machines. (EPA OIG photos)

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# At a Glance

## Why We Did This Project

This audit resulted from a hotline request submitted in June 2016 by the then acting Regional Administrator for Region 5 of the U.S. Environmental Protection Agency (EPA). The acting Regional Administrator requested that the Office of Inspector General (OIG) review Region 5's property procedures for information technology (IT) equipment. We sought to determine whether Region 5 had controls in place that protect IT property—especially computer laptops—from fraud, waste or misuse.

Following our preliminary research, we expanded the scope of our audit to look at similar controls for Region 2 and headquarters' Office of Water (OW) to determine whether there were any trends that should be of concern to the EPA.

The EPA's Office of Administration and Resources Management (OARM) is responsible for EPA property management.

### This report addresses the following:

- *Operating efficiently and effectively.*

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Listing of [OIG reports](#).

## ***EPA Region 5 Needs to Better Protect Information Technology Property, and Areas for Agencywide Improvement Exist***

### What We Found

Our review of Region 5's accountability over IT property based on the hotline request yielded the following areas of concern:

- No policy existed for tracking laptops in transition.
- Personnel were unaware of IT property status or procedural changes.
- Excess property was not always tracked or recorded.
- Existing policy did not include guidance for taking laptops out of the office.
- The role of property custodians was not always included in employee performance standards.

**A lack of sufficient controls for managing IT property creates vulnerability to fraud, waste and abuse, including potential theft and misuse.**

Our further review of how Region 2 and OW managed IT property identified additional concerns that represent agencywide issues OARM should address:

- Agencywide responsibility for the EPA property management program rested with a non-managerial-level employee.
- Personnel lacked sufficient awareness of the EPA's Agency Asset Management System and were not always using the system.
- EPA guidance for excess IT personal property was not established. *Excess personal property* means any personal property under the control of any federal agency that is no longer required for that agency's needs as determined by the agency head or designee.
- Property roles and responsibilities were often not included in employee performance standards.
- A required form documenting employee property custody was rarely used.

### Recommendations and Planned Agency Corrective Actions

We made five recommendations to Region 5 focusing on the need to create or revise policies and procedures to address deficiencies. Further, we made five recommendations to OARM to strengthen that office's role as the agency's overall property management organization. Lastly, we made a recommendation to OW and Region 2 regarding employee performance standards.

Region 5, Region 2 and OW agreed with the recommendations addressed to them and provided adequate planned corrective actions and completion dates. OARM had disagreed with most of our draft report recommendations, and we modified the recommendations to OARM as a result of OARM's response. OARM subsequently concurred with all the revised recommendations and provided adequate planned corrective actions and completion dates.



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

THE INSPECTOR GENERAL

May 9, 2018

**MEMORANDUM**

**SUBJECT:** EPA Region 5 Needs to Better Protect Information Technology Property,  
and Areas for Agencywide Improvement Exist  
Report No. 18-P-0176

**FROM:** Arthur A. Elkins Jr.

A handwritten signature in black ink, appearing to read "Arthur A. Elkins Jr.", is written over the printed name.

**TO:** *See Below*

This is our report on the subject audit conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). The project number for this audit was OA-FY16-0260. This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final EPA position. Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

In accordance with EPA Manual 2750, your offices provided acceptable corrective actions and milestone dates in response to OIG recommendations. All recommendations are resolved and no final response to this report is required. However, if you submit a response, it will be posted on the OIG's website, along with our memorandum commenting on your response. Your response should be provided as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that you do not want to be released to the public; if your response contains such data, you should identify the data for redaction or removal along with corresponding justification.

We will post this report to our website at [www.epa.gov/oig](http://www.epa.gov/oig).

Addressees:

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# Chapter 1

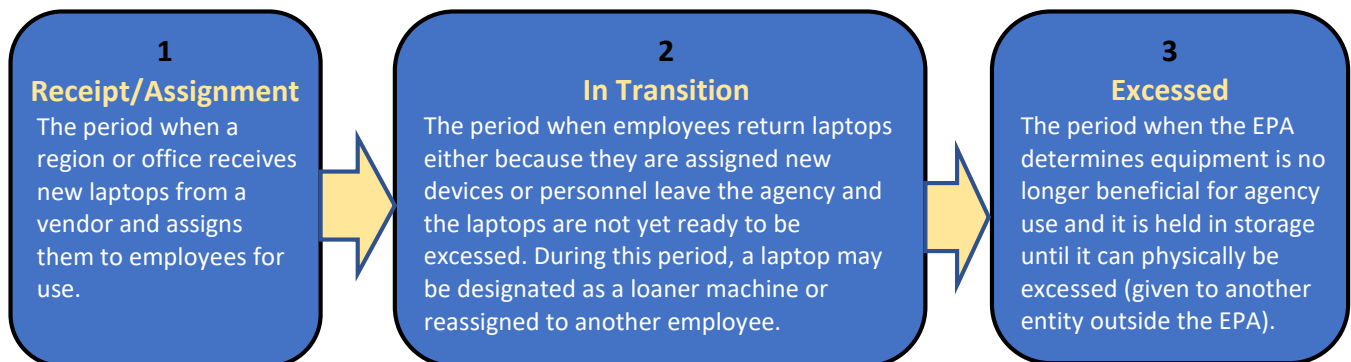
## Introduction

### Purpose

The U.S. Environmental Protection Agency's (EPA's) Office of Inspector General (OIG) hotline received a letter dated June 15, 2016, from the then acting Regional Administrator, Region 5, requesting that we review Region 5's information technology (IT) property procedures. Based on our preliminary research, we expanded the scope of our audit to include other locations in the agency to determine whether similar issues existed. The objective for our audit was to determine whether EPA Regions 2 and 5 and headquarters' Office of Water (OW) had established and implemented controls that protect IT property<sup>1</sup> from fraud, waste or misuse.

### Background

For our audit, we identified three basic phases during which a laptop computer would be in the possession of the EPA rather than an employee:



Source: EPA OIG graphic.

### ***Roles Involved With IT Property Management***

The EPA Property Management Program is organized by accountable areas,<sup>2</sup> with employees having specific duties to control and account for the EPA's personal property assets. Property officers are responsible for day-to-day implementation of the personal property program and include:

- Property Management Officers (PMOs).
- Property Accountable Officers (PAOs).

<sup>1</sup> Section 3.4.11 of the *EPA Personal Property Manual* defines sensitive property as all assets, regardless of unit acquisition cost, that require special controls and accounting to ensure accountability and safeguarding, and provides a list of items, including laptop computers, personal digital assistants (BlackBerries) and smartphones (cellular phones).

<sup>2</sup> An accountable area is an area designated for property management in which an EPA facility or a cluster of facilities is located. The EPA has 24 accountable areas located throughout the United States.

- Property Utilization Officers (PUOs).
- Property Custodial Officers (PCOs).

Appendix A lists additional roles involved in IT property management.

### **Key EPA Systems Used in Property Management**

There are a number of systems that house key data related to EPA property, as shown in Table 1.

**Table 1: Systems with data on EPA property**

<b>System</b>	<b>Description</b>
<b>Compass Financials</b>	This is the agency's overall financial management system. Compass Financials supports the activities that provide accurate and comprehensive financial data—including property, stewardship and operating performance information—and enables effective decision-making at all levels to support cost-effective mission achievement and risk mitigation.
<b>“Sunflower” (Agency Asset Management System)</b>	This web-based resource is the EPA's system of record for maintaining agency property.
<b>eBusiness</b>	eBusiness, managed by the agency's Office of Environmental Information, is used by headquarters program offices to order new equipment. The system houses all IT property information from the time a person starts working for the EPA and equipment is requested to when the property is excessed. Sunflower is also used to track property.
<b>Belmanage (Region 5)</b>	This is an IT tracking database that Region 5 uses to maintain information on regional computers that are in use and how often they are used.
<b>Inventory Management System (Region 2)</b>	Region 2 created its own electronic inventory management system to track IT property and monitor computer use and access in the region.

Source: OIG analysis.

## **Responsible Offices**

### **Office of Administration and Resources Management**

According to the *EPA Personal Property Policy and Procedures Manual*, the Assistant Administrator for the Office of Administration and Resources Management (OARM) is responsible for “providing direction to develop and establish an effective and efficient agency wide property management program.” The Assistant Administrator’s responsibilities include “providing guidance for good management practices based on established policies and procedures”; “evaluating and reviewing property management operations and processes”; and “assigning responsibilities to specific Property Officers by grants of authority, instruction and direction.”

### **Office of Environmental Information**

The EPA’s Office of Environmental Information’s (OEI’s) mission “is to securely deliver quality information, technology and services to advance the overall EPA



mission.” According to the EPA Senior Agency Information Security Officer, OEI has no specific role in creating or enforcing policies related to the physical control of IT property, as that is an OARM function; OEI’s role is focused on safeguarding the *data on* IT property (such as network servers), not physically protecting the IT property itself.

### ***Office of Water***

There are two personnel primarily responsible for property management within OW: a PAO and an Information Management Officer. The Information Management Officer helps implement IT and information management functions and responsibilities. There are 20 custodial areas within OW and each has an assigned PCO. These staff also coordinate with OARM and OEI on property management issues. OW uses Sunflower and eBusiness to track and manage IT property.

### ***Region 5***

Region 5’s Resources Management Division consists of five branches and a regional laboratory, two of which (Employee Services and Information Management) conduct work directly related to IT property management. The Employee Services Branch provides safe and effective facilities, work environments and infrastructure services, enabling people to capably perform their jobs in office, field and laboratory settings. The Region 5 PAO and property tracking function reside within this branch. Region 5’s Information Management Branch is the central point for Region 5 IT solutions and management of information resources. This branch maintains information on regional computers in use and how often they are used through Belmanage, the region’s IT asset inventory database.

### ***Region 2***

Region 2’s Office of Policy and Management includes two branches that focus on IT property management issues. The Facilities and Administrative Management Branch provides services such as operations support, including property management. This branch records items such as computers and laptops into the EPA’s property database. Region 2’s Information Resources Management Branch is responsible for the full range of IT and information resources services.

## **Scope and Methodology**

We conducted this audit from July 2016 through January 2018 in accordance with generally accepted government auditing standards issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

As part of our audit, conducted in response to a hotline request from Region 5, we performed a preliminary review of Region 5 IT property policies and specific EPA criteria related to IT property. We also interviewed Region 5 branch managers and key personnel responsible for IT property. We obtained and reviewed regional and program office assurance letters and policies and procedures related to IT property. We gathered information from all 21 Region 5 PCOs regarding their roles and responsibilities as PCOs. We conducted a site visit to the Region 5 headquarters in Chicago, Illinois. We also visited Region 5's offsite continuity of operations facility in Willowbrook, Illinois. We judgmentally selected some computers for review to determine whether Region 5 was tracking them and performed a physical inspection of IT property. We interviewed multiple Region 5 property personnel, including PCOs, the acting Information Security Officer, the region's PUO, its PAO and applicable branch chiefs. We also discussed our audit with Region 5's then acting Regional Administrator.

We later validated issues noted related to Region 5 and selected two additional EPA offices (OW and Region 2) for review. For OW, we interviewed key property representatives; conducted a site visit during which we interviewed PCOs, the OW Information Security Officer and several key contractor personnel; and judgmentally sampled several laptops to determine whether they were being tracked. For Region 2, we interviewed key representatives and conducted a site visit at the region's headquarters in New York City, New York. We interviewed the PMO and Information Resources Management Branch Information Management Officer, the Region 2 Information Security Officer, the Sunflower system administrator and several PCOs. We judgmentally sampled several laptops to determine whether they were being tracked.

## Prior Audit Coverage

We issued three prior audit reports that included issues related to the management of IT property and, in some cases, included findings similar to ones in this report:

- *EPA Needs Better Management of Personal Property in Warehouses*, Report No. [15-P-0033](#), issued December 8, 2014.
- *Early Warning Report: Main EPA Headquarters Warehouse in Landover, Maryland, Requires Immediate EPA Attention*, Report No. [13-P-0272](#), issued May 31, 2013.
- *EPA's Contract Oversight and Controls Over Personal Computers Need Improvement*, Report No. [11-P-0705](#), issued September 26, 2011.

Details on each report are in Appendix B.

## Chapter 2

### Region 5 Was Not Consistently Tracking IT Property

We found that Region 5 had not designed an internal control system that included needed policies, procedures, techniques and mechanisms that address related risks associated with protecting regional IT property from fraud, waste and misuse. We noted the following areas of concern regarding accountability over IT property:

- No policy existed for tracking laptops in transition.
- Personnel were unaware of IT property status or procedural changes.
- Excess property was not always tracked or recorded.
- Existing policy for taking laptops out of the office did not provide specific guidance on the issue and needs to be updated.
- The role of property custodian was not always included in employee performance standards.

*EPA Personal Property Policy and Procedures Manual*, Section 1.3.4, indicates that all EPA employees are responsible for “properly caring for, handling, utilizing, and being accountable for EPA personal property assigned for their use within or away from an EPA facility.” Failure to adequately track property can result in fraud, waste and abuse. Further, having no documented policies or procedures can result in employees being unaware of their responsibilities, which can lead to misuse or theft of government IT property.

#### Region 5 Has No Policy for Tracking Laptops in Transition

Region 5 did not have a policy that requires laptops in transition to be tracked in an inventory system. The region also did not always track in-transition laptops while in storage, or have up-to-date records of stored IT property in Sunflower (the agency’s official system of record for maintaining agency property).

During our site visit to Region 5 in October 2016, we learned that a contractor for the region had a supply of in-transition laptops, which can be used by employees waiting to be assigned a new computer or by employees whose assigned laptops are not working properly. In January 2017, we conducted an unannounced site visit to the region’s storage facility, which houses in-transition laptops.

We identified 85 in-transition laptops and 67 desktop computers. Region 5’s Belmanage system does not track laptops that have not been connected to the network for a period of 3 months or longer. While the region’s Desktop Technical Manager said a Region 5 contractor is now keeping a record of those laptops that



Region 5 loaner laptops in transition. (EPA OIG photo)

show no connection to the network after just 1 month of inactivity, this requirement is not documented in any policy or procedure. A Region 5 procedure, *IT Equipment Asset Inventory Management*, effective September 13, 2016, does not include procedures to specifically address the tracking of in-transition laptops or the production and maintenance of monthly Belmanage reports to allow comparisons between successive months for tracking computers in transition.



Loaner laptops on a contractor desk in Region 5. (EPA OIG photo)

During our unannounced site visit in January 2017, we found that 39 laptops in the original listing provided by Region 5 were not in the storage room location for which they were listed. When conducting the site visit, we observed the room's contents, took photographs and physically counted the laptops. Region 5 later indicated it was able to locate all 39 laptop computers. We also identified another 12 laptops that were in the storage room but were not on Region 5's listing of computers for that room. We determined that the original listing provided was not accurate, and the region agreed with our conclusion.

Section 10.03 under Principle 10 of the September 2014 U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government*, "Design of Appropriate Types of Control Activities," includes the following guidance:

Management designs appropriate types of control activities for the entity's internal control system. Control activities help management fulfill responsibilities and address identified risk responses in the internal control system.

This guidance lists "[p]hysical control over vulnerable assets" as an example of a common category of control activities. Without a documented policy or procedure describing the process to track in-transition laptops, the equipment is vulnerable to theft or fraud. Region 5 property and IT personnel acknowledged they need to improve how they track such equipment.

## **Region 5 Property Personnel Were Not Aware of IT Property Status or Procedural Changes**

PCOs were not kept informed when laptops arrived in Region 5 and were assigned to employees. When Region 5 receives a shipment of new laptops, a contractor must load software onto each machine to make it operate correctly. After that is done, the contractor via email notifies the employee who will be receiving the laptop that the machine is ready for use. However, the assigned PCO is not notified when this occurs, even though tracking the laptop falls within the assigned PCO's custodial responsibilities. Further, although the PCO for Region 5's Information Management Branch checks laptop shipments received and reconciles items with the original purchase order, that process is not documented.

In addition, a new Region 5 standard operating procedure for IT property, *IT Equipment Asset Inventory Management*, became effective September 13, 2016. When we visited Region 5 in October 2016, a regional PCO, the acting Information Security Officer, and an employee serving in a temporary supervisory role within the Information Management Branch were not aware of the new procedure, which had been effective for several weeks.

Section 3.04 under Principle 3 of the September 2014 U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government* includes the following guidance regarding organizational structure:

As part of establishing an organizational structure, management considers how units interact in order to fulfill their overall responsibilities. Management establishes reporting lines within an organizational structure so that units can communicate the quality information necessary for each unit to fulfill its overall responsibilities.

That guidance also states that "Reporting lines are defined at all levels of the organization and provide methods of communication that can flow down, across, up, and around the structure."

Region 5's *IT Equipment Asset Inventory Management* procedure, effective September 2016, does not address the process for reconciling new laptop shipments or communication to the PCO related to new equipment arrivals. Without timely and clear communication between Region 5's Employee Services Branch and Information Management Branch, and within the Information Management Branch, the risk for theft and misuse will remain high.

## Region 5 Excess Property Was Not Always Tracked or Recorded

Excess IT property was not always recorded in Region 5 systems for tracking excess IT property. Also, decal information for excess property was not always included in the system. Further, records of this property did not always exist within the active regional asset management system prior to being excessed.



Region 5 cage with new equipment to be assigned and older property to be excessed. (EPA OIG photo)

We selected two new laptops that had recently been received and two old desktops that were considered excess property from Region 5's storage area to validate whether those pieces of equipment had been identified in Region 5's IT property tracking systems. We asked the Desktop Technical Manager to locate all four in the Region 5 Access System, but he was unable to find information for the two older desktops in the system. He agreed with our conclusion that if the two desktops were stolen, no one would know because there was no record of them. That lack of tracking and records increases the risk of theft or misuse.

We also found that Region 5 did not maintain data on excess IT property in the region's asset management system (Belmanage). Region 5 management referred to evidence that excess regional IT property once tracked in Belmanage could not be confirmed because EPA IT support contractors clean up the information in Belmanage once a month related to any equipment that was excessed or returned at the end of service.

Section 3.2.7 of the *EPA Personal Property Policy and Procedures Manual* states "Sensitive items, which are nonexpendable items (EPA owned or leased) that may be converted to private use or have a high potential for theft, must be recorded and controlled as accountable property. This type of accountability requires property to be tracked throughout its life cycle regardless of cost or value." Section 3.2.7 also provides a list of sensitive items that include desktop computers (central processing unit [CPU] only), laptop computers, projectors, and PDAs (e.g., BlackBerries, Palm Pilots). In addition, it also discusses the responsibilities of property personnel and states "PAOs and COs are responsible for the accountability of sensitive items and should use proper documentation (i.e., property passes/hand receipts, custody cards, decals) to track all sensitive items."



Sample Region 5 EPA IT property decal. (EPA OIG photo)

Region 5's newly developed standard operating procedure, *IT Equipment Asset Inventory Management*, effective September 13, 2016, did not provide specific information on how to track excess property within the existing asset management systems.

Without a documented policy and procedure describing the process to track property to be excessed and evidence demonstrating it was tracked prior to being excessed, such equipment in Region 5 is vulnerable to theft or fraud as it moves through the phases involved in managing IT property.

## **Region 5 Policy on Networked Laptops Is Not Up-to-Date and Does Not Provide Specific Guidance for Taking Laptops Out of Office**

Region 5's current policy discussing taking laptops out of the office, *Implementation of Networked Laptops as Desktop Computers Policy*, which Region 5 signed on February 27, 2009, provides only general information related to removing laptops out of the office and no specific guidance, and is also out of date. The only pertinent provision is in Section 5.15, which states: Security procedures for taking laptops out of the office shall be consistent with applicable regional, office, or divisional policies/procedures for taking out government equipment." The region's Information Management Branch told us that employees follow an unwritten process, and the Chief Information Officer (CIO) 2150.4 *Mobile Computing Policy* also sets expectations. We reviewed CIO 2150.4

and the EPA's *Telework Policy* and found that neither contains specific provisions covering employees taking laptops out of the office.

Region 5 needs to revise the existing Region 5 *Implementation of Networked Laptops as Desktop Computers Policy* to provide specific guidance on taking laptops out of the office. Having no specific guidance for employees who take government IT property out of the office to telework creates a vulnerability because those employees are not being made aware of their responsibilities, and misuse or theft of government IT property could result.

## **Region 5 Property Roles and Duties Were Often Not in Employee Performance Standards**

For Region 5, the role of being a PCO was not included in Performance Appraisal and Recognition System (PARS) documents for four of the six PCOs we interviewed. The role and associated property management duties of the Region 5 PUO—a key property official—also were not listed in the person's PARS standards. The Region 5 PUO said it did not occur to him to include the roles of the PCOs or his own role in respective performance plans. The Office of Personnel Management's *A Handbook for Measuring Employee Performance*, dated September 2011, and EPA Order 3151, *Performance Appraisal and Recognition System*, note the need for employee expectations to be set in performance plans. Further details on this guidance are in Chapter 3.

## **Recommendations**

We recommend that the Regional Administrator, Region 5:

1. Issue a policy and procedure describing how to properly track returned laptops that have not been excessed (in transition), including what records should be maintained to account for such laptops in storage.
2. Revise the current standard operating procedures to address the process for reconciling new laptop arrivals and assignments with Property Custodial Officers.
3. Establish a policy and procedure for tracking excess property within Region 5.
4. Update the current Region 5 policy, *Implementation of Networked Laptops as Desktop Computers Policy*, signed February 27, 2009, to include guidance on the removal of laptop computers from the office.
5. Direct managers to include property roles in employee performance standards for staff responsible for managing government property at the supervisory level or below.

## Agency Response and OIG Evaluation

Region 5 agreed with Recommendations 1 through 5 and provided acceptable planned corrective actions and dates for completion. For Recommendations 1 through 3, Region 5 stated that it will review, update or amend varying sections of the existing language of its *IT Equipment Asset Inventory Management* procedure, originally issued in September 2016. For Recommendation 4, Region 5 stated that it plans to update its *Implementation of Networked Laptops as Desktop Computers Policy* to recognize the current situation where almost all Region 5 employees use government-furnished laptops in the office or in an alternative work location. For Recommendation 5, Region 5 plans to develop standardized roles and responsibilities language for both PCOs and PUOs and update their PARS agreements. Region 5 plans to complete corrective actions for the first four recommendations by July 1, 2018, and for the fifth recommendation by October 1, 2018.



## Chapter 3

### OARM Needs to Strengthen Its Role as EPA's Property Manager

Our review of the management of IT property by additional EPA organizations beyond Region 5—specifically, OW and Region 2—noted concerns that lead us to believe that OARM needs to strengthen its role as the EPA's property manager. OARM has not consistently communicated or enforced requirements covering EPA IT property management or provided agency tools in a timely manner to support PCOs in tracking IT property. We noted the following areas of concern:

- Agencywide responsibility for the EPA property management program rested with a non-managerial-level employee.
- Personnel lacked sufficient awareness of the EPA's Agency Asset Management System (Sunflower) and were not always using the system.
- EPA guidance on preparing property to be excessed was not established.
- Property roles and duties often were not included in employee performance standards.
- A required form documenting employee custody was not always used.

OARM should take a more prominent role as the agency's overall property management organization. Without direct OARM oversight and leadership, the EPA's property program is at an increased risk of being inefficient and ineffective and, ultimately, IT property is more likely to be subject to fraud, waste and misuse.

#### Agencywide Responsibility for EPA Property Management Program Rested With One Non-Managerial-Level Employee

We found that the responsibilities of the EPA property management program had rested with the Agency Property Management Officer (APMO), an employee not serving in a managerial capacity. Regarding duties as cited in the *EPA Personal Property Policy and Procedures Manual*, the employee was responsible for core tasks associated with the EPA's property program, including creating policy, ensuring program accountability, and advising and training employees on their responsibilities for managing property. The APMO's superior was responsible for administration tasks, such as appointing specific personnel and reviewing and preparing specific property reports. This assignment of responsibilities for property management indicated insufficient attention by OARM to the important task of managing the EPA's personal property program.

According to Section 1.1.3 of the *EPA Personal Property Policy and Procedures Manual*, dated April 18, 2006, the Director of OARM's Facilities Management and Services Division was responsible for administering the EPA Personal

Property Management Program. The Director's responsibilities included the following:

- Serving as the reviewing authority for matters pertaining to personal property management.
- Designating an APMO.
- Appointing members to the Board of Survey for headquarters.
- Appointing, in writing, a PMO, PAO and PUO, and forwarding copies of the designations to the APMO.
- Approving annual capitalized personal property inventory reports certified by Senior Resource Officials and submitted by the APMO.
- Preparing and submitting required external reports on behalf of the EPA Personal Property Management Program.

The APMO was responsible for all aspects of leading and managing the EPA's Personal Property Management Program agencywide. The APMO's specific responsibilities, as given in Section 1.1.6 of the *EPA Personal Property Policy and Procedures Manual*, include:

- Developing policy and issuing directives supporting the EPA Personal Property Management Program.
- Providing leadership and technical assistance to property officers.
- Establishing and maintaining policies and procedures that satisfy requirements of the *EPA Personal Property Policy and Procedures Manual* and the various laws and regulations referenced.
- Administering a program that ensures the effective accountability, utilization and disposal of EPA-owned personal property.
- Conducting periodic reviews and evaluations to identify weaknesses in personal property management programs and providing recommendations for strengthening programs.
- Submitting required personal property management reports within the agency and externally.
- Ensuring that all accountable personal property is maintained in the Integrated Financial Management System.<sup>3</sup>
- Advising employees of their responsibilities for managing and accounting for government personal property as well as providing training as needed.

When we asked OARM management whether having a nonsupervisory employee in charge of the entire property management program represents a problem, management responded with a simple "no" and provided no other information. Based on that response, it was our opinion that OARM management did not find it problematic that a nonsupervisory employee was responsible for the EPA's overall property management program.

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<sup>3</sup> The Integrated Financial Management System has been replaced by Compass Financials. According to the APMO, this is an update that will be made to the *EPA Personal Property Policy and Procedures Manual*.

Section 3.07 of the of the U.S. Government Accountability Office’s *Standards for Internal Control in the Federal Government*, dated September 2014, states:

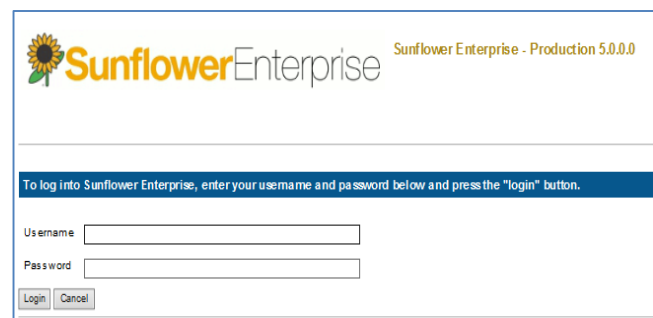
[M]anagement considers the overall responsibilities assigned to each unit, determines what key roles are needed to fulfill the assigned responsibilities, and establishes the key roles. Those in key roles can further assign responsibility for internal control to roles below them in the organizational structure, **but retain ownership for fulfilling the overall responsibilities assigned to the unit.** [emphasis added]

OARM leadership did not take an active role in carrying out the core responsibilities assigned to the APMO that should contribute to the successful functioning of the EPA’s property program. We believe placing all responsibilities for managing the program on a non-managerial-level employee for an agency the size of the EPA may result in a property program for which desired initiatives are undermined or overlooked because the authority of the person in charge of the program is limited.

During our audit, in June 2017, OARM released an updated version of its personal property manual, retitled the *EPA Personal Property Manual*. We reviewed it and concluded that the roles and responsibilities involving the leadership, oversight and accountability assigned to property management personnel are now better distributed between the APMO and the APMO’s superiors. The responsibility for managing and overseeing the EPA’s personal property management program is now shared and not assigned to one employee.

## PCOs Lacked Awareness of Sunflower Property Management System or Were Not Consistently Using That System

OARM has made an effort to communicate to the EPA the need to use Sunflower—the property management system used to report information to the Office of the Chief Financial Officer for use in financial statement reporting. However, for the locations reviewed, we found that some property personnel did not always know of or use Sunflower. OARM has provided memorandums and announcements to Senior Resource Officials and property personnel on the use of Sunflower, but we found that OARM needs to continue to emphasize the need for property personnel to use Sunflower. OARM also needs to update the *EPA Personal Property Policy and Procedures Manual* so that it identifies Sunflower as the EPA’s property management system of record.



Snapshot of Sunflower system login page. (EPA OIG photo)

EPA property personnel in Region 2 generally lacked awareness of Sunflower. OW personnel interviewed indicated that they knew of the system but did not use it. Further, staff in Regions 2 and 5 stated that they did not always use Sunflower to track IT property. Also, key tools that support use of Sunflower in fulfilling property management duties have not been made available to appropriate personnel, and milestone dates to deploy the tools have been continuously revised.

To determine whether PCOs were consistently using Sunflower, we interviewed PCOs and reviewed a sample of laptops to identify whether they were being tracked in Sunflower. Four of the eight PCOs in Region 2 we interviewed (50 percent) had no knowledge of Sunflower, while another two (25 percent) had heard of it but had never used it. Three of the five OW PCOs interviewed (60 percent) did not use Sunflower, and one of the those three indicated never having heard of the system.

We selected a sample of eight laptops in Region 5 and asked the PAO to locate them in Sunflower. The PAO was able to find only one of the eight laptops in the system (13 percent). For the seven laptops not found in Sunflower, the PAO also could not find records of those laptops in Compass Financials.

During a site visit of the OW computer storage facilities, we judgmentally selected a sample of 14 laptop computers to determine whether they were being tracked in eBusiness and Sunflower. While we found data for all 14 laptops in Sunflower and eBusiness, three of the 14 laptops (21 percent) were physically located somewhere other than where the two systems stated they should be.



OW desktops not in use in a cage in storage room. (EPA OIG photo)

For Region 2, we selected eight laptops and asked the Information Management Officer to locate them in the region's Inventory Management System. That officer located all eight of the laptops in the system. However, when we asked Region 2's Sunflower system administrator to locate all eight of the laptops in Sunflower, the Sunflower system administrator was able to locate only three of the eight (38 percent).



Region 2 cabinet containing new laptops or on a litigation hold. (EPA OIG photo)

Also, scanners that would assist PCOs in consistently fulfilling property management duties were not made available in a timely manner, and milestone dates to deploy them were continuously revised. Sunflower became the EPA's official property management system in February 2016 and property personnel were told scanners would be provided to them for use with Sunflower. EPA property personnel requested that OARM supply scanners for use with Sunflower to help them more easily track property items. Scanners had been requested by several Region 5 property personnel during use of the EPA's prior property tracking system but none were provided by OARM; one

Region 5 PCO has wanted the functionality of using scanners for years and purchased one for his own use. He believes that Region 5 needs barcode scanners because all property tracking is done manually and scanners will reduce error rates. The Region 2 Sunflower system administrator and one Region 2 PCO also told us that having the scanners would be very helpful. According to the APMO, scanners can be used to scan IT property barcodes and scanned information will then automatically populate in Sunflower. OARM representatives told the OIG the scanners would be distributed by December 2016. The APMO said all regions and program offices finally received scanners in June 2017.

Several EPA property personnel said Sunflower should be integrated into their local inventory management system. One OW PCO indicated that OARM and OEI need to work together to integrate eBusiness and Sunflower because having two different systems that capture the same data creates more mistakes and an inability to track inventory properly. Region 2's Information Management Officer indicated there should be some way to link the local system and Sunflower to avoid the need to enter similar data into two systems. However, the EPA's APMO said there are no plans to integrate Sunflower with local systems—Sunflower is the EPA's asset management system of record and all property data should be maintained in Sunflower.

According to the *EPA Personal Property Policy and Procedures Manual*, Section 1.1.1, "The Assistant Administrator for OARM is responsible for providing direction to develop and establish an effective and efficient property management program." Therefore, OARM needs to update the *EPA Personal Property and Procedures Manual* to identify Sunflower as the EPA's official system of record for maintaining information on IT property. OARM should also continue to communicate to EPA property personnel at all levels that they must update Sunflower regularly so that the system contains accurate data.

In response to the OIG's draft report, OARM provided documents showing that it had communicated to EPA personnel in the past about Sunflower. OARM indicated that the APMO conducts site visits and monthly conference calls with agency property representatives to provide guidance on agency policies, and offer support and training. While OARM provided such support, we found that two of the three locations we audited did not have all information on laptops in Sunflower. For the third location, incorrect data was maintained in Sunflower on the physical location of laptops selected for review. Therefore, the OIG maintains the position that Sunflower is not being consistently used or updated by all EPA locations, and we believe that OARM needs to verify that IT property data is included and updated in Sunflower in a timely manner.

## **OARM Procedures for Excessing IT Property Not Established**

OARM has not created specific guidance to assist EPA regions and program offices in excessing IT property to meet applicable EPA and federal requirements. We found that Region 2, Region 5 and OW are maintaining supplies of excess IT

property because they were told the equipment must first be sanitized of data before the equipment is excessed; however, they do not have that capability. Disk sanitization involves the overwriting of all previously stored data with a predetermined pattern of meaningless information, such as a binary pattern, its complement and an additional third pattern.

### ***EPA Guidance and Federal Regulations Govern Disposition of Excess Equipment***

EPA and General Services Administration (GSA) guidance require that excess property first be transferred or reported as excess within the EPA and then GSA. Section 1.1.1 of the *EPA Personal Property Policy and Procedures Manual* states that the Assistant Administrator for OARM is responsible for providing guidance for good management practices based on established policies and procedures. Section 4.2.2 of the *EPA Personal Property Policy and Procedures Manual* provides the following guidance for excess property:

After a Program declares personal property to be excess, the Property Utilization Officer within the AA [Accountable Area] holding the excess property will work with the Property Custodial Officers from the other Custodial Areas to determine whether there is a need for the excess property within the AA. If there is not, the PAO will transfer the item in IFMS [Integrated Financial Management System] into Custodial Area 999, where it can be viewed by the other AAs. Upon transfer of the excess personal property to Custodial Area 999, the other AAs will have 15 calendar days as part of the intra-agency screening process to claim it.

Section 4.2.3 of the *EPA Personal Property Policy and Procedures Manual* continues by stating “All excess personal property that is not claimed during EPA’s 15-day intra-agency screening process should be reported to GSA.”

GSA’s *Federal Management Regulation*, Section 102–36.220, indicates that “all excess personal property must be reported to GSA, including excess personal property to which the government holds title but is in the custody of contractors or grantees.”

### ***EPA Is Maintaining Excess Supplies***

We learned from Region 5’s PAO that the region had not excessed older-model cellphones since January 2015. During our site visit to Region 5 in October 2016, we observed an excess supply of cellphones in a storage room and boxes of older-model cellphones stored in file cabinets in the Employee Services Branch space. Region 5 provided the OIG with a report containing data on all mobile phones; this



Region 5 excess cellphones stored in one of several boxes. (EPA OIG photo)

report stated that there were 312 Region 5 cellphones no longer in use. Region 5 indicated that in August 2014 OEI had instructed Region 5 not to send cellphones outside the EPA. Due to these instructions, Region 5 has been holding onto older-model cellphones.



One of two boxes containing excess cellphones in OW. (EPA OIG photo)

Similar to Region 5, OW had excess older-model cellphones that were not reported to the EPA or GSA and were not excessed. During our January 2017 site visit to OW, we found that one OW PCO had been holding onto two boxes of older-model cellphones for 4 years. The OW PCO attempted to excess the cellphones in March 2013 but was told they needed to be sanitized of data prior to excessing. The PCO then went through the process of wiping the cellphones but as of August 2017 was still holding onto them awaiting further instructions from OW.

Region 2 indicated that it has a supply of older laptops because the region does not have the capability to sanitize them of data that may represent government records. As of March 2017, Region 2 had 511 laptops that could be excessed. Region 2 representatives stated that the contractor they use to electronically delete data from old laptops did not meet the requirements to prepare them for excessing. Further, officials said the cost may outweigh the benefit of wiping them because the computers are of little value due to age.



Region 2 laptops on carts to be used for parts. (EPA OIG photo)

### ***EPA Needs to Clarify and Develop Guidance for Excess Property***

We followed up with OEI and learned that OEI, in consultation with the EPA Office of General Counsel, sent out an email on August 6, 2014, to all Assistant Administrators, Regional Administrators and other agency leaders requiring that, until further notice, they not sanitize any mobile devices that are exchanged as part of the migration effort. The email also instructed that, until further notice, the devices were not to be processed out of the agency. The Office of General Counsel was concerned that the EPA should not dispose of any device until OEI personnel are sure employees are doing so properly.

The process involving the use of a form started in December 2016. However, guidance on what to do with old devices is still being developed, and there is no target completion date. OEI was uncertain about EPA and GSA requirements for the excessing of older-model cellphones and emphasized that Office of General Counsel guidance in 2014 stated that older cellphones should not be excessed. OARM needs to be involved in creating guidance specific to the excessing of IT property so that excess property is not maintained for long periods of time and property personnel are following EPA and GSA procedures. Not excessing

property as required can result in government property not being reused or recycled.

OW and Region 2 have an excess supply of older-model laptop computers in storage. In January 2017, we viewed three boxes containing 19 older laptops in the possession of one OW PCO. The PCO stated that she had been holding onto those older laptops because she did not have the equipment to sanitize them. The EPA uses a contractor for managing desktop support for headquarters, several other offices and laboratory locations. The OW PCO said that neither a current nor prior contractor wanted to deal with excessing the laptops. OW management indicated that OW is working to implement corrective actions to address this issue.

## **Property Roles and Duties Often Not Included in Employee Performance Standards**

For some property personnel in the locations audited, the role of PCO was not included in their PARS documents. In one case, the performance plan of an employee whose main duties included property management functions did not have the applicable duties. In another case, one property management employee did not have his role listed in his performance plan. Without setting and documenting expectations for employees regarding roles and responsibilities, management cannot appropriately hold employees accountable for performing important property management duties.

For OW, four of the five PCOs interviewed did not have the title of PCO listed in their PARS, and associated property duties were minimal or not included. OW does not have any policies or procedures covering the management of IT property that include provisions covering property management roles and duties and the need to include them in employee performance standards.

For Region 2, the associated PCO duties were listed in the PARS of only two of the eight PCOs interviewed. For the other six PCOs, the title of PCO was not shown on any of their PARS performance documents, and stated property duties were minimal or not included at all. The Region 2 Information Management Officer, who was also a PCO, likewise did not have his duties cited in his PARS document. Region 2 provided us a newly issued document, *IT Inventory Management*, but we found that the document did not discuss (a) property management roles or duties of PCOs or other property roles, (b) the need to include those roles in performance documents or (c) the internal controls needed for such roles.

For Region 5, details on the inclusion of specific job tasks for property management roles not listed in performance documents are in Chapter 2.

OARM's APMO indicated that the role of PCO and other property roles fall under the performance category of "other duties as assigned." The APMO said that the federal government currently does not have a description for property



positions and how they would be graded, and OARM is looking for best practices and metrics within the government for such property positions. Property management duties are generally considered collateral duties because they fall outside a PCO's main job duties and are not listed in their official employee performance standards. In turn, such employees cannot be held accountable to any specific requirements or standards of performance associated with property management.

Chapter 1 of the Office of Personnel Management's *A Handbook for Measuring Employee Performance*, dated September 2011, states:

Employees must know what they need to do to perform their jobs successfully. Expectations for employee performance are established in employee performance plans [PARS]. Employee performance plans are all of the written, or otherwise recorded, performance elements that set forth expected performance.

In addition, according to EPA Order 3151, *Performance Appraisal and Recognition System*:

An employee must have a minimum of two and no more than five critical elements in their PARS plan. ... The critical element is to describe the work assignments and responsibilities that are significantly influenced by an employee's work effort and within the employee's control.

We believe that it is critical that OARM verify that responsibilities for managing government property have been included in employee performance standards for all employees managing government property at the supervisory level or below.

## **Form Documenting Employee Custody of Property Not Used**

Only Region 2 employees used a form that is identified by the *EPA Personal Property Policy and Procedures Manual*—Form 1740-22, “Personal Property Custody Card”—as the one to be used by users to acknowledge IT property assigned to them. Only three of the eight Region 2 employees reviewed used the form. None of the six PCOs reviewed for Region 5 or the five reviewed for OW used the form. OARM has not ensured consistent use of this form by all EPA locations per the *EPA Personal Property Policy and Procedures Manual*. According to Section 2.1.3 of the *EPA Personal Property and Procedures Manual*, all staff should sign the form when receiving property:

EPA Form 1740-22 should be used to document the assignment of personal property to an EPA employee when appropriate (e.g., laptops, cell phones, personal digital assistants [PDA]). EPA Form 1740-22 should be completed by the CO [custodial officer] and signed by the employee, acknowledging responsibility for the

property listed on the card. The CO should maintain all custody cards on file.

Without documenting the acknowledgment of responsibility for government IT property, management may not be able to hold EPA employees accountable for the loss, misuse or theft of property.

We believe that it is critical that OARM verify that regions and program offices are using the Personal Property Custody Card as OARM had previously directed and as mentioned in the *EPA Personal Property Manual*.

## Recommendations

We recommend that the Assistant Administrator for Water and the Regional Administrator, Region 2:

6. Require managers to include property roles in employee performance standards for staff responsible for managing government property at the supervisory level or below.

We recommend that the Assistant Administrator for Administration and Resources Management:

7. Verify that information technology property data is included and updated in Sunflower in a timely manner.
8. Coordinate with the Office of Environmental Information on the creation of guidance that includes specific timeframes for properly sanitizing and excessing information technology property in accordance with EPA and federal requirements.
9. Update the *EPA Personal Property Manual* with timeframes for sanitizing and excessing information technology property and verify that EPA regions and program offices are following the new disposal procedures.
10. Verify that approved language on the responsibilities for managing government property has been included in employee performance standards for all staff responsible for managing government property at the supervisory level or below.
11. Verify whether EPA regions and headquarters program offices are using Form 1740-22, "Personal Property Custody Card," as directed by the Office of Administration and Resources Management and mentioned in the *EPA Personal Property Manual*.

## Agency Response and OIG Evaluation

Region 2, OW and OARM agreed with all the recommendations in this final report and provided acceptable planned corrective actions and dates for completion.

Recommendation 6 of the draft directed OW and Region 2 to require managers to include property roles in performance standards for employees who manage government property. Region 2 and OW agreed with Recommendation 6 on the inclusion of property roles in performance standards for personnel who manage property. Region 2 indicated that it will review the performance standards of all staff with responsibility for property management and make any necessary changes to those standards by the first quarter of 2019, which ends December 31, 2018. Region 2's planned corrective action and completion date is acceptable. OW said it would provide language developed by OARM to incorporate into employee PARS documents by February 2018. In April 2018, OW provided information to us showing that in March 2018 they incorporated such language into the PARS documents for its employees managing property. OW has completed its corrective action and we consider the recommendation regarding OW to be closed.

OARM did not agree with most of the report findings and recommendations, and provided responses to each recommendation along with documents to support its position. Details on each recommendation follow:

Recommendation 7 of the draft report directed OARM to review tasks involved in the management of the EPA's property program and to assign such tasks to management personnel within OARM. OARM's response to Recommendation 7 in the draft report said that the updated version of the *EPA Personal Property Policy and Procedures Manual* clarified and defined roles and responsibilities for property management. The OIG reviewed the updated manual, now titled *EPA Personal Property Manual*, and found that property management personnel roles and responsibilities for the EPA personal property program are better distributed between all property program personnel. We revised the finding in Chapter 3 and removed our draft report Recommendation 7 from this final report.

Recommendation 8 of the draft report directed OARM to communicate with all EPA property personnel that Sunflower is the agency's system of record for IT property information and it should be updated in a timely manner. OARM's response to our draft report Recommendation 8 pointed to past email and phone communications demonstrating that OARM had announced Sunflower as the EPA's Asset Management System and the need to use it. We agree that those documents demonstrated OARM's communication efforts in the past with regard to the official use of Sunflower. However, based on our report findings, OARM needs to verify that Sunflower is being used and data input and updated in a timely manner. We revised Recommendation 8 from our draft report to

recommend that OARM verify that IT property data is included and updated in a timely manner. That recommendation is now Recommendation 7.

Recommendation 9 of the draft directed OARM to coordinate with OEI to create guidance for properly excessing IT property in accordance with EPA and federal requirements. For that recommendation, OARM pointed to the updated *EPA Personal Property Manual*, dated June 2017, for information on sanitization of IT property, which is located in Section 7.7 of the manual. We reviewed this section and found that it discusses sanitizing excess property and states the following: “All sensitive information technology (IT) property must be screened by the RLO [Records Liaison Officer] for records retention and sanitized by the Office of Environmental Information (OEI) before it is released from the EPA.” We note that Section 7.7 does not provide a timeframe as to how long it should take OEI to sanitize property before it is released from the EPA. We modified Recommendation 9 of the draft report, which is now Recommendation 8, to recommend that OARM coordinate with OEI on creating guidance that will identify a specific time frame for sanitizing IT property. OARM stated that the APMO periodically meets with OEI’s Property Management Team to address disposition requirements for IT equipment. We added a new Recommendation 9, for the EPA to update the *EPA Personal Property Manual* with the new guidance and verify that EPA regions and program offices are following the guidance for sanitizing and timely excessing IT property.

Recommendation 10 of the draft report directed OARM to require all EPA locations to include property roles in performance standards for employees who manage government property. For Recommendation 10 of the draft report, the OIG agrees with OARM’s proposed action to provide language to be included in employee performance standards on property roles. We modified Recommendation 10 to indicate that, once that language is developed and distributed, OARM is to verify that this language has been included in employee PARS documents for EPA employees performing property management roles.

Recommendation 11 of the draft report instructed OARM to direct all EPA locations to use Form 1740-22 per the *EPA Personal Property Policy and Procedures Manual*. For that recommendation, OARM referred to Section 6.4.2 of the updated *EPA Personal Property Manual*. We found that the section addresses the use of EPA Form 1740-22, “Personal Property Custody Card,” to document assigning stewardship of property in the performance of employees’ duties. OARM also provided a separate memo related to this issue in its response to our draft report. We reviewed this memo and found that it discusses 2-year property passes for laptops, and it does not relate to the use of Form 1740-22. Since OARM stated that the use of this form has been communicated to the EPA in the past, we

modified Recommendation 11 for OARM to verify that this communication on the desire to use EPA Form 1740-22 has been successful and determine whether EPA regions and program offices are actually using the form.

On March 13, 2018 we provided our modified recommendations to OARM to review, and discussed them with OARM on April 9, 2018. During that meeting, OARM concurred with all of our revised recommendations. On April 13, 2018, OARM provided the OIG with acceptable proposed corrective actions and dates for completing the actions. Specifics for each recommendation follow:

For Recommendation 7 in this report, OARM stated that it will check the Agency Asset Management System on a monthly basis for technology personal property assets that have been purchased to confirm that those assets had been input to the system within 5 days of receipt as required by the EPA's *Personal Property Manual*. OARM stated that it plans to complete this action for the first time by May 31, 2018.

For Recommendation 8 in this report, OARM said that it will work with OEI to establish timeframes by June 30, 2018, for sanitizing equipment designated to be excessed.

For Recommendation 9 in this report, OARM said that it will provide a bulletin to update the *EPA Personal Property Manual* once timeframes for sanitizing equipment have been established with OEI. OARM said that it planned to take this action by July 31, 2018. Further, OARM stated that 4 months after the bulletin has been issued, OARM will randomly select locations nationwide to confirm that the updated procedure is being followed. OARM intends to complete this action by November 30, 2018.

For Recommendation 10 in this report, OARM said that by August 31, 2018, it will provide language and direct managers to include property roles in employee performance standards for staff at the supervisory level or below who are responsible for managing government personal property. Further, OARM stated it will randomly select locations nationwide to request copies of PARS agreements of selected property personnel to ensure the language has been incorporated. OARM plans to complete that action by January 31, 2019.

For Recommendation 11 in this report, OARM said that it will confirm on a quarterly basis the use of Form 1740-22 during nationwide property teleconferences that it conducts. OARM stated it plans to complete this action for the first time by May 31, 2018.

# Status of Recommendations and Potential Monetary Benefits

## RECOMMENDATIONS

Rec. No.	Page No.	Subject	Status <sup>1</sup>	Action Official	Planned Completion Date	Potential Monetary Benefits (in \$000s)
1	9	Issue a policy and procedure describing how to properly track returned laptops that have not been excessed (in transition), including what records should be maintained to account for such laptops in storage.	R	Regional Administrator, Region 5	7/1/18	
2	9	Revise the current standard operating procedures to address the process for reconciling new laptop arrivals and assignments with Property Custodial Officers.	R	Regional Administrator, Region 5	7/1/18	
3	9	Establish a policy and procedure for tracking excess property within Region 5.	R	Regional Administrator, Region 5	7/1/18	
4	9	Update the current Region 5 policy, <i>Implementation of Networked Laptops as Desktop Computers Policy</i> , signed February 27, 2009, to include guidance on the removal of laptop computers from the office.	R	Regional Administrator, Region 5	7/1/18	
5	9	Direct managers to include property roles in employee performance standards for staff responsible for managing government property at the supervisory level or below.	R	Regional Administrator, Region 5	10/1/18	
6	20	Require managers to include property roles in employee performance standards for staff responsible for managing government property at the supervisory level or below.	C R	Assistant Administrator for Water and Regional Administrator, Region 2	3/30/18 12/31/18	
7	20	Verify that information technology property data is included and updated in Sunflower in a timely manner.	R	Assistant Administrator for Administration and Resources Management	5/31/18	
8	20	Coordinate with the Office of Environmental Information on the creation of guidance that includes specific timeframes for properly sanitizing and excessing information technology property in accordance with EPA and federal requirements.	R	Assistant Administrator for Administration and Resources Management	6/30/18	
9	20	Update the <i>EPA Personal Property Manual</i> with timeframes for sanitizing and excessing information technology property and verify that EPA regions and program offices are following the new disposal procedures.	R	Assistant Administrator for Administration and Resources Management	11/30/18	
10	20	Verify that approved language on the responsibilities for managing government property has been included in employee performance standards for all staff responsible for managing government property at the supervisory level or below.	R	Assistant Administrator for Administration and Resources Management	1/31/19	
11	20	Verify whether EPA regions and headquarters program offices are using Form 1740-22, "Personal Property Custody Card," as directed by the Office of Administration and Resources Management and mentioned in the <i>EPA Personal Property Manual</i> .	R	Assistant Administrator for Administration and Resources Management	5/31/18	

<sup>1</sup> C = Corrective action completed.  
R = Recommendation resolved with corrective action pending.  
U = Recommendation unresolved with resolution efforts in progress.

## ***Agency Roles Involved in IT Property Management***

Name	Reference	Description
<b>Assistant Administrator for OARM</b>	Section 1.1.1, <i>EPA Personal Property Policy and Procedures Manual</i>	Provide direction to develop and establish an effective and efficient property management program.
<b>Director, Office of Administrative Services</b>	Section 1.1.2, <i>EPA Personal Property Policy and Procedures Manual</i>	Provide guidance for the EPA Personal Property Management Program.
<b>Director, Facilities Management and Services Division</b>	Section 1.1.3, <i>EPA Personal Property Policy and Procedures Manual</i>	Administer the EPA Personal Property Management Program.
<b>Agency Property Management Officer</b>	Section 1.1.6, <i>EPA Personal Property Policy and Procedures Manual</i>	Manage the EPA Personal Property Management Program agencywide.
<b>Property Management Officer</b>	Section 1.2.1, <i>EPA Personal Property Policy and Procedures Manual</i>	Provide for effective day-to-day implementation of the Personal Property Management Program within their program office/region.
<b>Property Accountable Officer</b>	Section 1.2.2, <i>EPA Personal Property Policy and Procedures Manual</i>	Ensure the effective acquisition, management, utilization and disposal of personal property.
<b>Program Accountable Representative</b>	Section 1.3.1, <i>EPA Personal Property Policy and Procedures Manual</i>	Support the annual inventory process to ensure that it is properly completed. Assist with efforts to ensure that all personal property is accounted for. Provide a notice to the PMO on any EPA installation or activity scheduled to be discontinued or any major program change affecting the office's personal property.
<b>Property Utilization Officer</b>	Section 1.2.3, <i>EPA Personal Property Policy and Procedures Manual</i>	Promote the acquisition and profitable use of available excess personal property from known sources, including the EPA, GSA and other federal agencies.
<b>Property Custodial Officer</b>	Section 1.2.4, <i>EPA Personal Property Policy and Procedures Manual</i>	Provide for the proper care, use, accountability and security of personal property assigned to their custodial areas.
<b>Division Directors and Branch Chiefs (or equivalent)</b>	Section 1.3.3, <i>EPA Personal Property Policy and Procedures Manual</i>	Establish and enforce administrative directives and measures for EPA personal property within their control.
<b>Information Management Officer</b>	Office of the Chief Financial Officer website	Serve as an official for each Assistant Administratorship, Regional Office and the Office of the Administrator, reporting to the Senior Information Official. Support the Senior Information Official in implementing the Senior Information Official's IT and information management functions and responsibilities.

Sources: *EPA Personal Property Policy and Procedures Manual* and Office of the Chief Financial Officer website.

## ***Details on Prior Audit Coverage***

### ***EPA Needs Better Management of Personal Property in Warehouses*** (Report No. [15-P-0033](#), issued December 8, 2014)

The OIG determined that the EPA did not implement effective oversight and controls to ensure efficient use of stored EPA property. Though the EPA contracted for almost \$50 million for warehouse management at the eight facilities reviewed, it had incomplete information, which impaired its ability to safeguard property against theft, loss, waste and mismanagement. We recommended that the EPA update policies to inventory non-accountable and all electronic property, have the same inventory management system for all property stored, and reconcile annual physical inventory counts against its inventory system records for all personal property. Additionally, we recommended that the EPA optimize space, improve property storage procedures, and address oversight and accountability. The EPA agreed with our recommendations and completed all corrective actions by February 2016.

### ***Early Warning Report: Main EPA Headquarters Warehouse in Landover, Maryland, Requires Immediate EPA Attention*** (Report No. [13-P-0272](#), issued May 31, 2013)

Our initial research at the EPA's Landover warehouse raised significant concerns with the lack of agency oversight of personal property and warehouse space at the facility. We found that a warehouse recordkeeping system had incomplete and inaccurate data, and the warehouse was filled with unusable, inoperable and obsolete furniture and other items. Although the OIG made no recommendations in this report, the agency issued a stop work order to the contractor, ensuring there would be no further access to the site by contractor personnel and that no further costs would be incurred under the contract. The agency also completed an inventory of the warehouse and sought an appraisal of inventoried items.

### ***EPA's Contract Oversight and Controls Over Personal Computers Need Improvement*** (Report No. [11-P-0705](#), issued September 26, 2011)

The OIG determined that the EPA did not know the status of 638 personal computers valued at over \$1 million. In addition, the EPA did not have accurate property data in its financial system. We found inconsistencies in the location of personal computers, incorrect serial numbers, and inaccurate descriptions. We made four recommendations in this report. We recommended that the OARM update the property manual to require the separation of duties in property staff positions and consider assigning permanent property positions throughout the agency to ensure that there are safeguards over EPA's assets. We also recommended that the OARM develop and implement processes that would (a) require property staff to routinely review and update the Fixed Assets Subsystem database, and (b) ensure that property staff adhere to records retention requirements. The EPA agreed with our recommendations and completed all corrective actions by April 2014.



## ***Region 5's Response to Draft Report***



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGIONAL ADMINISTRATOR  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

**FEB 08 2018**

### MEMORANDUM

**SUBJECT:** Response to Office of Inspector General Draft Report No. OA-FY16-0260 *EPA Region 5 Needs to Better Protect Information Technology Property, and Potential Areas for Agencywide Improvement Exist*

**FROM:** Cathy Stepp  
Regional Administrator  
Region 5

**TO:** Michael D. Davis  
Director, Efficiency Directorate  
Office of Audit and Evaluation

Thank you for the opportunity to respond to the recommendations in the audit report titled, “*Region 5 Needs to Better Protect Information Technology Property, and Potential Areas for Agencywide Improvement Exist.*” Region 5 is committed to improving our property management processes and procedures to minimize waste, fraud and abuse of Government Furnished Equipment (GFE), including information technology. As requested in the January 10, 2018, transmission from OIG, Region 5 is providing the response, which summarizes the Region’s position on each of the five report recommendations.

### REGION 5’S OVERALL POSITION

As you will see in the chart below, Region 5 agrees with the five recommendations. Region 5 has completed an IT Equipment Asset Inventory Management Standard Operating Procedure (SOP), most recently updated on February 10, 2017, which address in part Recommendations 1, 2, and 3 of the audit report. Corrective actions for the remaining recommendations are in progress.

REGION 5'S RESPONSE TO SPECIFIC REPORT RECOMMENDATIONS

<b>Number</b>	<b>Recommendation</b>	<b>Intended Corrective Action(s)</b>	<b>Estimated Completion &amp; Contacts</b>
1	Issue a policy and procedure describing how to properly track returned laptops that have not been excessed (in transition), including what records should be maintained to account for such laptops in storage.	The Region 5 Information Management Branch, working with the Employee Services Branch, issued a Standard Operating Procedure (SOP) for IT Equipment Asset Inventory Management on September 13, 2016 and revised the SOP on February 10, 2017. The SOP establishes R5 procedures to identify and document all IT equipment, from the procurement request to the end of life disposal/ excessing method. Section IV will be updated to provide more specificity on labels for the various states (procured, in use, in transition, excess) to describe the status of a piece of equipment.	The planned completion date for this corrective action is July 1, 2018.  Contact: Ken Tindall, Region 5 IMB Chief, (312) 886-9895 and Marc Colvin, Region 5 ESB Chief, (312) 886-0138
2	Revise the current standard operating procedures to address the process for reconciling new laptop arrivals and assignments with Property Custodial Officers.	The IT Equipment Asset Inventory Management SOP identified in response to Recommendation 1, above, includes Section III, Equipment Delivery Notice and Delivery Process. The language in this section will be reviewed and amended to fully address this recommendation.	The planned completion date for this corrective action is July 1, 2018.  Contact: Ken Tindall, Region 5 IMB Chief, (312) 886-9895 and Marc Colvin, Region 5 ESB Chief, (312) 886-0138
3	Establish a policy and procedure for tracking excess property within Region 5.	The IT Equipment Asset Inventory Management SOP identified in response to Recommendation 1, above, includes Section V, Assets Disposal/Excessing. The language in this section will be	The planned completion date for this corrective action is July 1, 2018.  Contact: Ken Tindall, Region 5

		reviewed and amended to fully address this recommendation.	IMB Chief, (312) 886-9895 and Marc Colvin, Region 5 ESB Chief, (312) 886-0138
4	Update the current Region 5 policy, <i>Implementation of Networked Laptops as Desktop Computers Policy</i> , signed February 27, 2009, to include guidance on the removal of laptop computers from the office.	The <i>Implementation of Networked Laptops as Desktop Computers Policy</i> will be updated to recognize the current situation where almost all Region 5 employees use Government Furnished Equipment (GFE) laptops in the office and at their Alternative Work Location (AWL) and provide guidance on assuring proper custodianship of the GFE.	The planned completion date for this corrective action is July 1, 2018. Contact: Ken Tindall, Region 5 IMB Chief, (312) 886-9895
5	Direct managers to include property roles in employee performance standards for staff responsible for managing government property at the supervisory level or below.	Region 5 will develop standardized roles and responsibilities language for both Property Custodial Officers and Property Utilization Officers and will update the PARS agreements for employees with these duties. OARM may be consulted for relevant standard Agency language.	The planned completion date for this corrective action is October 1, 2018.  Contact: Marc Colvin, Region 5 ESB Chief, (312) 886-0138 and Amy Sanders, Region 5 HCO, (312) 353-9196

We appreciate the efforts of the audit team and the team's responsiveness to our comments on the initial discussion drafts of this report. If you have any questions regarding this response, please contact Ken Tindall, Chief, Information Management Branch at (312) 886-9895 or [tindall.kenneth@epa.gov](mailto:tindall.kenneth@epa.gov), Marc Colvin, Chief, Employee Services Branch at (312) 886-0138 or [colvin.charles@epa.gov](mailto:colvin.charles@epa.gov), or Eric Levy, Region 5 Audit Coordinator at (312) 353-3611 or [levy.eric@epa.gov](mailto:levy.eric@epa.gov).

Cc: Ed Chu  
Cheryl Newton  
Bruce Sypniewski  
Amy Sanders  
Marc Colvin  
Ken Tindall  
Eric Levy  
Randy Holthaus

## ***Region 2's Response to Draft Report***



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 2  
 290 BROADWAY  
 NEW YORK, NY 10007-1866

FEB - 1 2018

### MEMORANDUM

**SUBJECT:** Response to Office of Inspector General Draft Report No. OA-FY16-0260  
 "EPA Region 5 Needs to Better Protect Information Technology Property, and  
 Potential Areas for Agencywide Improvement Exist," dated January 10, 2018.

**FROM:** Peter D. Lopez  
 Regional Administrator

A handwritten signature in black ink, appearing to read "Peter D. Lopez".

**TO:** Michael D. Davis, Director, Efficiency Directorate  
 Office of Audit and Evaluation  
 Office of Inspector General

Thank you for the opportunity to respond to the issues and recommendations in the subject audit report. Following is a summary of Region 2's overall position, along with our position on one recommendation directed to Region 2. Region 2 agrees with recommendation no. 6, and we have provided high-level intended corrective action and an estimated completion date.

### REGION 2'S OVERALL POSITION

Region 2 agrees with the OIG that performance standards relating to property management should be included in employee performance standards where the level of non-supervisory staff involvement is necessary to create a critical element of a performance agreement. Such language may be included for supervisory or managerial employees with responsibility for many administrative matters. Specific language in the performance agreement may be appropriate for supervisory or managerial employees with significant responsibility for property management.

REGION 2’S RESPONSE TO REPORT RECOMMENDATIONS

No.	Recommendation	High-Level Intended Corrective Action(s)	Estimated Completion by Quarter and FY
1	We recommend that the Regional Administrator, Region 2, require managers to include property roles in employee performance standards for staff responsible for managing government property at the supervisory level or below.	Region 2 will review the performance standards of all staff with responsibility for property management, and make any necessary changes to those standards.	1 <sup>st</sup> Quarter FY 2019

CONTACT INFORMATION

If you have any questions regarding this response, please let me know or have your staff contact Region 2’s Audit Coordinator, John Svec, at (212) 637-3699.

## OW's Response to Draft Report




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

FEB 8 2018

OFFICE OF WATER

### MEMORANDUM

**SUBJECT:** Response to Office of Inspector General Draft Report No. OA-FY16-0260 — *EPA Region 5 Needs to Better Protect Information Technology Property, and Potential Areas for Agencywide Improvement Exist*, dated January 10, 2018

**FROM:** David P. Ross   
Assistant Administrator

**TO:** Michael D. Davis  
Director, Efficiency Directorate  
Office of Audit and Evaluation

Thank you for the opportunity to respond to the issues and recommendation in the subject audit report. Following is a summary of the agency's overall position, along with its position on the report's recommendation. For the report's findings, we have already implemented a number of responsive actions to ensure consistency among custodial responsibilities and to devise a better tracking process of inventoried equipment. In reference to the recommendation, we are providing our intended corrective action and estimated completion date.

### OFFICE OF WATER'S OVERALL POSITION

The Office of Water appreciates being provided with the opportunity to respond to the OIG evaluation regarding how the Office of Water (OW) managed information technology (IT) property. OW's management and staff worked diligently to develop appropriate controls to ensure consistent, efficient and accurate handling of IT property as well as guidance for the property custodial officers.

As described below, we accept the recommendation made by the OIG and agree that the implementation can help to strengthen the understanding of the associated property duties for a custodial officer. We appreciate the productive and positive interactions we had with OIG evaluators during the investigation, as well as the cooperation of EPA staff and IT property audit partners who responded to OIG inquiries.

We request that you include the entirety of this response as an appendix to the OIG final report.

OFFICE OF WATER’S RESPONSE TO REPORT RECOMMENDATION

**Recommendation 1:** Require managers to include property roles in employee performance standards for staff responsible for managing government property at the supervisory level or below.

**Response:** The Office of Water concurs with the purpose of the recommendation. We have received manual developed by the Office of Administration and Resources (OARM), per their policy manual that should be included in the employee’s performance standards regarding their custodial property responsibilities. Our staff will continue to share best practices within the program offices and disseminate relevant information that will track and monitor IT equipment.

Summary of Agreements

No.	Recommendation	EPA Office	Corrective Action(s)	Estimated Completion by Quarter and FY
1	Require managers to include property roles in employee performance standards for staff responsible for managing government property at the supervisory level or below.	OW	Provide the managers/supervisors of property custodial officers the language as developed by OARM to incorporate in their Performance Appraisal and Recognition System(PARS).	February 2018 and ongoing as appropriate

CONTACT INFORMATION

If you have any questions regarding this response, please contact Steven Moore, Audit Follow-up Coordinator of the Office of Water at 202-564-0992 or moore.steven@epa.gov.

CC: Benita Best-Wong, OW  
Tim Fontaine, OW  
Steven Moore, OW  
Robert Stevens, OW  
Sharon Gonder, OW  
Miriam Wiggins-Lewis, OW

## ***OARM's Response to Draft Report***



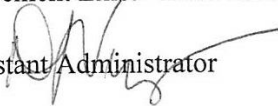
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

FEB 9 2018

OFFICE OF  
ADMINISTRATION  
AND RESOURCES  
MANAGEMENT

### **MEMORANDUM**

**SUBJECT:** Response to Office of Inspector General Draft Report No. OA-FY16-0260  
"EPA Region 5 Needs to Better Protect Information Technology Property and  
Potential Areas for Agencywide Improvement Exist" dated January 10, 2018

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

**TO:** Michael D. Davis, Director, Efficiency Directorate  
Office of Audit and Evaluation  
Office of Inspector General

Thank you for the opportunity to respond to the issues and recommendations in the subject audit report. Attached is the Office of Administration and Resources Management's response; regions 2 and 5, the Office of Water and the Office of Environmental Information are responding separately.

OARM does not agree with most of the report findings and recommendations as currently written. The agency's 4832 Personal Property Manual, updated in June 2017, outlines roles and responsibilities for tracking agency assets. This report appears to incorrectly cross local procedures for managing assets with agency requirements for tracking and disposing of agency assets which as directed by the EPA's property manual. This report also suggests program and regional offices establish "policies" instead of "procedures." Property policies are set forth in the manual. Any local related procedures should be in line with the agency policies.

Attachment 1 lists report recommendations for OARM and our related responses. We have also attached other relevant supporting documents.



If you have any questions regarding this response, please contact Yvette Jackson, Director of the Real Property Services Staff, Office of Administration, OARM, at (202) 564-7231. Thank you.

#### Attachments

cc: John Showman  
Vaughn Noga  
Maryann Petrole  
Lauren Lemley  
Marilyn Armstrong  
Yvette Jackson  
David Shelby  
Marian Cooper

No.	Recommendation	OARM Response
7.	Review all tasks involved in the management of the EPA's personal property program as noted in the <i>EPA Personal Property Policy and Procedures Manual</i> or other key criteria as needed, assign tasks to property management personnel within the Office of Administration and Resources Management, and update the manual to reflect any changes.	<p>Roles and responsibilities are clearly defined in EPA's 4832 Personal Property Manual – chapter 2. The manual and appendices were updated in June 2017 and can be found in the following intranet links:</p> <p>Manual: <a href="http://intranet.epa.gov/ohr/rmpolicy/ads/manuals/4832-EPA-Personal-Property-Policy-and-Procedures-Manual-8-15-2017.pdf">http://intranet.epa.gov/ohr/rmpolicy/ads/manuals/4832-EPA-Personal-Property-Policy-and-Procedures-Manual-8-15-2017.pdf</a></p> <p>Appendices: <a href="http://intranet.epa.gov/ohr/rmpolicy/ads/manuals/4832-EPA-Personal-Property-Policy-and-Procedures-Manual-Appendices.pdf">http://intranet.epa.gov/ohr/rmpolicy/ads/manuals/4832-EPA-Personal-Property-Policy-and-Procedures-Manual-Appendices.pdf</a></p>
8.	Communicate with all EPA property personnel in the regions and headquarters program offices that the agency's system of record for maintaining information technology property information is Sunflower, and require information technology property data to be included and updated in Sunflower in a timely manner.	<p>OARM issued several emails to the Senior Resource Officials and the Assistant Regional Administrators (Attachments 2-4). Please note that the Program Accountable Representatives, Property Management Officers, Property Accountable Officers, Property Utilization Officers, and Custodial Officers were copied. There have also been many national monthly property calls addressing the implementation of the new agency asset management system.</p> <p>The Agency Property Management Officer also makes site visits and holds monthly conference calls with agency property representatives to provide guidance on agency policies, offer support and training and to answer questions.</p>
9.	Coordinate with the Office of Environmental Information and create guidance for properly excessing information technology property so that EPA and federal requirements are met.	This is addressed in the in EPA's 4832 Personal Property Manual. The disposition guidelines for IT equipment are the same as for all other assets. The Agency Property Management Officer periodically meets with OEI's Property Management Team to address disposition requirements for IT equipment.
10.	Require all EPA regions and headquarters program offices to include property roles in employee performance standards for staff responsible for managing government property at the supervisory level or below.	OARM will provide language to EPA regions and program offices regarding property roles and responsibilities for inclusion in employees' performance standards.
11.	Direct all EPA regions and headquarters program offices to use Form 1740-22, "Personal Property Custody Card," per the <i>EPA Personal Property Policy and Procedures Manual</i> .	The Personal Property Manual identifies the use of Form 1740-22 – see Chapter 6.4.2. The Agency Property Management Officer sent a memo to the Agency Personal Property Managers dated June 10, 2015 (Attachment 5) on the property pass requirement. This requirement is also addressed in training sessions and national monthly property calls.

## ***Distribution***

The Administrator  
Chief of Staff  
Chief of Operations  
Deputy Chief of Operations  
Chief Financial Officer  
Assistant Administrator for Administration and Resources Management  
Assistant Administrator for Water  
Assistant Administrator for Environmental Information  
Agency Follow-Up Coordinator  
General Counsel  
Associate Administrator for Congressional and Intergovernmental Relations  
Associate Administrator for Public Affairs  
Regional Administrator, Region 5  
Regional Administrator, Region 2  
Principal Deputy Assistant Administrator for Administration and Resources Management  
Deputy Assistant Administrator for Administration and Resources Management  
Director, Office of Administration, Office of Administration and Resources Management  
Director, Office of Resources, Operations and Management, Office of Administration  
and Resources Management  
Deputy Director, Office of Resources, Operations and Management, Office of Administration  
and Resources Management  
Deputy Assistant Administrator for Water  
Principal Deputy Assistant Administrator for Water  
Principal Deputy Assistant Administrator for Environmental Information  
Deputy Regional Administrator, Region 5  
Director, Resources Management Division, Region 5  
Deputy Regional Administrator, Region 2  
Assistant Regional Administrator for Policy and Management, Region 2  
Audit Follow-Up Coordinator, Office of the Administrator  
Audit Follow-Up Coordinator, Office of Administration and Resources Management  
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Audit Follow-Up Coordinator, Office of Environmental Information  
Audit Follow-Up Coordinator, Region 5  
Audit Follow-Up Coordinator, Region 2