



OFFICE OF INSPECTOR GENERAL U.S. ENVIRONMENTAL PROTECTION AGENCY

CUSTOMER SERVICE ★ INTEGRITY ★ ACCOUNTABILITY

Operating efficiently and effectively

EPA Effectively Planned for Future Remote Access Needs but Should Disconnect Unneeded Services in Timely Manner

Report No. 21-P-0241

September 20, 2021



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Abbreviations:

EIS	Enterprise infrastructure Solutions
E-MORRIS	Enhanced Monthly On-line Records and Reports of Information
EPA	U.S. Environmental Protection Agency
GSA	U.S. General Services Administration
OIG	Office of Inspector General

Cover Image: The EPA relies on its remote access capability to ensure continuity of operations in pandemic and natural disaster situations. (EPA OIG image)

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Office of Inspector General U.S. Environmental Protection Agency **At a Glance**

21-P-0241
September 20, 2021

Why We Did This Audit

We performed this audit to determine whether the U.S. Environmental Protection Agency effectively planned a long-term solution to address remote access concerns while transitioning to the U.S. General Services Administration's Enterprise Infrastructure Solutions contract. This contract will replace its predecessor contracts, which expire in May 2023, for governmentwide network and telecommunications solution programs.

Remote network access became mission critical in March 2020 as the EPA responded to the coronavirus pandemic. Continuing operations under the duress of pandemics and natural disasters requires the Agency to adapt its network to support a virtual workforce.

This audit supports an EPA mission-related effort:

- *Operating efficiently and effectively.*

This audit addresses these top EPA [management challenges](#):

- *Maintaining operations during pandemic and natural disaster responses.*
- *Complying with key internal control requirements (risk assessments).*
- *Enhancing information technology security.*

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[List of OIG reports.](#)

EPA Effectively Planned for Future Remote Access Needs but Should Disconnect Unneeded Services in Timely Manner

What We Found

The EPA effectively planned a long-term solution to address remote access concerns while transitioning to the U.S. General Services Administration's Enterprise Infrastructure Solutions contract. Specifically, in its solicitation for network and telecommunications services under the EIS contract, the EPA included a requirement that the selected vendor provide remote access solutions to support 12,500 concurrent remote users, with the capability to expand to 20,000 concurrent remote users. This range of concurrent remote users should meet the EPA's future workforce needs, since it exceeds the EPA's fiscal year 2020 workforce by almost 6,000 users.

Because the EPA did not disconnect unneeded GSA services in a timely manner, the Agency paid at least \$7,850 for services it was not using.

During our audit fieldwork, we identified a matter not directly related to our objective but related to the EPA's transition to the EIS contract. The EPA did not disconnect GSA services, such as analog phone and digital subscriber lines, that were no longer needed in a timely manner. Specifically, as part of its EIS transition activities, which began in 2015, the EPA identified unneeded GSA services, but as of May 2021, 268 of the services determined to be unneeded were still not disconnected. In addition, we reviewed eight EPA disconnection orders for unneeded services and found that it took from one to 61 months to disconnect them. These delays cost the EPA at least \$7,850.

The EPA did disconnect over 18,000 of unneeded GSA services from November 2016 through April 2021. Because the EPA has taken steps to disconnect unneeded services as part of its EIS transition activities, we make no recommendations regarding this finding.

The Agency did not provide a formal written response to the draft report.



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

THE INSPECTOR GENERAL

September 20, 2021

MEMORANDUM

SUBJECT: EPA Efficiently Planned for Future Remote Access Needs but Should Disconnect Unneeded Services in Timely Manner
Report No. 21-P-0241

FROM: Sean W. O'Donnell

A handwritten signature in blue ink that reads "Sean W O'Donnell".

TO: Lynnann Hitchens, Acting Principal Deputy Assistant Administrator
Office of Mission Support

This is our report on the subject audit conducted by the U.S. Environmental Protection Agency's Office of Inspector General. This project number for this audit was [OA-FY21-0066](#). This report contains findings that describe the problems the OIG has identified.

You are not required to respond to this report because this report contains no recommendations. If you submit a response, however, 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.

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Purpose

The Office of Inspector General [initiated](#) this audit to determine whether the U.S. Environmental Protection Agency effectively planned a long-term solution to address remote access concerns while transitioning to the U.S. General Services Administration’s Enterprise Infrastructure Solutions, or EIS, contract.

Top Management Challenges Addressed

This audit addresses the following top management challenges for the Agency, as identified in OIG Report No. [20-N-0231](#), *EPA’s FYs 2020–2021 Top Management Challenges*, issued July 21, 2020:

- Maintaining operations during pandemic and natural disaster responses.
- Complying with key internal control requirements (risk assessments).
- Enhancing information technology security.

Background

GSA Network and Telecommunications Contracts

The GSA is responsible for providing contracts for network and telecommunications services to federal agencies. Until May 31, 2023, the EPA will obtain its network and telecommunication services via four GSA contracts, three of which—the Networx Enterprise, the Networx Universal, and the Washington Interagency Telecommunications Systems contracts—are managed through the EPA’s Working Capital Fund. Services ordered through the Working Capital Fund are reviewed annually to determine if they are still needed or should be disconnected. The EPA’s fourth network and telecommunications contract with the GSA—the Local Service Agreement contract—allows the Agency to order services directly from the GSA for distribution to EPA locations.

The *Working Capital Fund* is an intragovernmental revolving fund of working capital authorized by law to finance a cycle of operations, to which the cost of goods and services provided are charged to the users on a fee-for-service basis.

After May 31, 2023, the EPA will obtain its network and telecommunications services under one GSA contract: the EIS contract. The EIS contract will be managed through the EPA’s Working Capital Fund. EPA representatives indicated that the transition from the four predecessor GSA contracts to the single EIS contract will allow the EPA to centralize the order-and-review process associated with GSA network and telecommunication services.

GSA EIS Transition Milestones

The GSA outlined transition activities and milestone dates for federal agencies transitioning to the EIS contract to ensure that network and telecommunications services remain uninterrupted when the predecessor GSA contracts expire on May 31, 2023. These activities began in 2015, when the GSA provided the transitioning federal agencies with access to its Enhanced Monthly On-line Records and

The GSA’s *E-MORRIS* database supports billing and inventory for the Networx contracts.

Reports of Information Technology Services, or E-MORRIS, database so that they could validate their inventory of services by October 2016. Table 1 documents the schedule of EIS transition activities, the EIS milestone dates, and the EPA’s status.

Table 1: Status of EPA’s EIS transition activities, as of July 2021

EIS transition activity	GSA milestone date	EPA status
Agencies validate service inventory against E-MORRIS database.	October 31, 2016	Not completed due to the E-MORRIS database containing over 60,000 flawed entries. The EPA estimated that it would cost over \$160,000 to conduct a full reconciliation.
Agencies develop Agency Transition Plan.	October 31, 2016	Completed on October 31, 2016.
Agencies issue Fair Opportunity solicitation to industry.	March 31, 2019	Completed on December 30, 2020. The GSA awarded the final authorization to operate to eligible vendors on December 18, 2019. Solicitations could not be sent to vendors without an authorization to operate.
Agencies award EIS task orders.*	September 30, 2019	Not completed. The EPA planned to award its EIS task order by June 29, 2021. As of July 2021, the EPA had not selected an EIS vendor.
Agencies achieve 50% transition of services.*	March 31, 2021	Not completed. The EPA cannot start transitioning services until after awarding its EIS task order.

Source: OIG summary of GSA and EPA EIS information. (EPA OIG table)

* Task order award and transition of services follow planning and occur during development and implementation of the long-term solution, which is outside the scope of this audit.

EPA Remote Access Is Critical Function

EPA employees use remote access to connect to the EPA’s network from remote locations. This capability became mission critical in March 2020 at the beginning of the coronavirus pandemic—that is, the SARS-CoV-2 virus and the resultant COVID-19 virus. Continuing EPA operations under the duress of pandemics and other natural disasters requires the Agency to adapt its network to support a primarily virtual workforce and provide an unprecedented number of remote employees with a reliable, stable means to communicate and access critical applications and data.

Responsible Offices

The Office of Mission Support is responsible for providing EPA employees with remote access to the Agency’s network. Within the Office of Mission Support, the Office of Information Technology Operations is responsible for implementing and managing the enterprise information technology infrastructure services and solutions to support the EPA’s mission, including the EPA’s transition to the GSA EIS contract.

Scope and Methodology

We conducted our work from January to August 2021. We conducted this performance audit in accordance with generally accepted government auditing standards. 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 audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

We assessed the internal controls necessary to satisfy our audit objective.¹ Specifically, we assessed the internal control components—as outlined in the U.S. Government Accountability Office’s Green Book—

¹ An entity designs, implements, and operates internal controls to achieve its objectives related to operations, reporting, and compliance. The U.S. Government Accountability Office sets internal control standards for federal entities in GAO-14-704G, *Standards for Internal Control in the Federal Government* (also known as the “Green Book”), issued September 10, 2014.

significant to our audit objectives: the risk assessment and the information and communication internal control components. Any internal control deficiencies we found are discussed in this report. Because our audit was limited to the internal control components deemed significant to our audit objective, it may not have disclosed all internal control deficiencies that may have existed at the time of the audit.

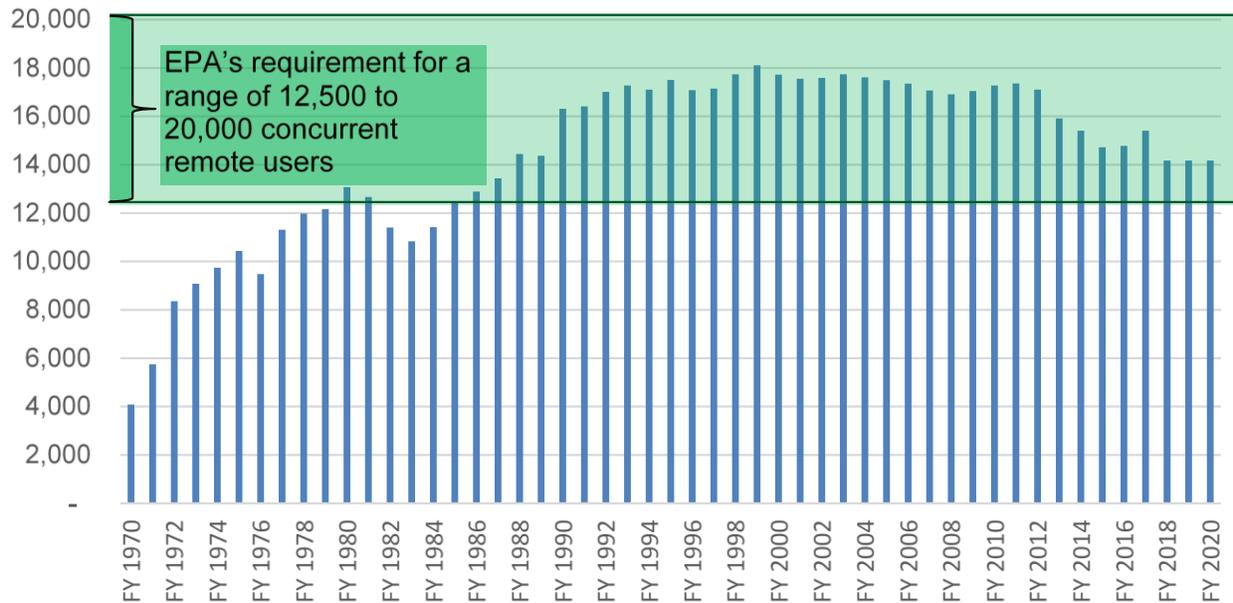
We reviewed federal and Agency guidance for system development life cycle and information technology contracts, as well as the EPA’s *Agency Transition Plan* submitted to the GSA. We interviewed and met with the EPA’s GSA representatives and the Agency personnel responsible for the EIS transition. We created a timeline to correlate the EPA’s EIS transition with GSA milestone dates and other dates that may have impacted the EPA’s EIS transition. We reviewed the remote access solutions identified in the EPA’s EIS solicitation statement of work and the EPA’s validated inventory of GSA services as of April 2021. We obtained the GSA spreadsheet of EPA disconnection orders and selected a sample of eight to determine whether services were disconnected in a timely manner.

Results

EPA Effectively Planned for Remote Access Needs

The EPA effectively planned a long-term solution to address remote access concerns and provide for adequate remote access capability as part of its transition to the EIS contract. In its solicitation package to award a task order under the EIS contract, the EPA included a requirement that the selected vendor be able to provide remote access solutions to support 12,500 concurrent remote users, with the capability to expand to 20,000 concurrent remote users. As shown in Figure 1, this range of concurrent remote users should meet the EPA’s future workforce needs, since it exceeds the EPA’s fiscal year 2020 workforce numbers by almost 6,000 users.

Figure 1: EPA workforce compared to EIS solicitation concurrent remote user capability



Source: OIG analysis of EPA EIS solicitation package and EPA workforce data. (EPA OIG image)

Legend: FY = Fiscal Year

EPA Needs to Disconnect GSA Services in Timely Manner

During the audit, we identified a matter not directly related to our audit objective but related to the transition to the EIS contract. Specifically, the EPA did not disconnect GSA services that were no longer needed in a timely manner. This likely occurred because the EPA did not have a process to regularly review all of its GSA services. Also, the EPA did not validate its GSA service inventory against the E-MORRIS database, as requested by the GSA.

As part of its EIS transition activities, the EPA developed an inventory of GSA services to transfer to the EIS contract and submitted disconnection orders for those services determined to be unneeded. Over 18,000 unneeded GSA services were disconnected from November 2016 through April 2021, but as of May 2021, 268 unneeded services had not been disconnected. EPA representatives stated that disconnection orders for the remaining services are being resubmitted.

We judgmentally selected eight EPA disconnection orders to review to determine how long it took to disconnect the unneeded GSA services. These eight disconnection orders covered 107 analog and digital subscriber line services, and the time frame between when the services were no longer needed and when they were disconnected varied from one to 61 months:

- One disconnection order for one service within the Office of Enforcement and Compliance Assurance was completed within one month of the service no longer being needed.
- One disconnection order for 34 services within Region 8 was completed within one month of the services no longer being needed.
- Of six disconnection orders for 72 services within the Office of Mission Support, 41 services were disconnected within two to 61 months of the services no longer being needed. As Table 2 shows, the delay in disconnection cost the EPA at least \$7,850. The Office of Mission support did not provide the dates of when 31 of the 72 services were no longer needed, so the costs incurred may be higher.

Table 2: Disconnection of unneeded services in Office of Mission Support

Time from when services was no longer needed to disconnection date	Number of services	Cost incurred after service was no longer needed until it was disconnected
Unknown	31	Unknown
Two months	25	\$2,074.81
10–12 months	6	1,143.53
14–19 months	4	1,551.14
47–48 months	3	1,459.35
61 months	3	1,621.62
Total	72	\$7,850.45 at a minimum

Source: OIG analysis of EPA data. (EPA OIG table)

Since we only looked at eight of the EPA’s disconnection orders, we do not know the total cost that the EPA paid for unnecessary services and whether that would have exceeded the estimated \$160,000 for the EPA to reconcile its inventory of services with the E-MORRIS database in 2016, as outlined in Table 1.

Conclusions

The EPA effectively planned a long-term solution to address remote access concerns and provide for adequate remote access capacity as part of its transition to the EIS contract. The EPA's EIS solicitation included a requirement that the selected vendor provide a concurrent remote access capability that exceeds the fiscal year 2020 EPA workforce by almost 6,000 users.

As part of its EIS transition activities, the EPA identified unneeded GSA services and has taken steps to disconnect these services. As a result, we make no recommendations regarding this finding. Furthermore, all future GSA network and telecommunications acquisitions will be funneled through the EIS contract, which will be managed through the EPA's Working Capital Fund. Since the EPA annually reviews all Working Capital Fund orders to determine whether they remain valid or should be disconnected, the EPA will have a regular process in place to disconnect all unnecessary network and telecommunications services after fully transitioning to the EIS contract.

The Agency did not provide a formal written response to the draft report.

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