

January 5, 2007

MEMORANDUM TO: Luis A. Reyes
Executive Director for Operations

FROM: Stephen D. Dingbaum **/RA/**
Assistant Inspector General for Audits

SUBJECT: STATUS OF RECOMMENDATIONS: AUDIT OF
NRC'S IMPLEMENTATION OF HOMELAND
SECURITY PRESIDENTIAL DIRECTIVE-12
(HSPD-12) (OIG-06-A-20)

REFERENCE: DIRECTOR, OFFICE OF ADMINISTRATION,
MEMORANDA DATED OCTOBER 30, 2006, AND
DECEMBER 20, 2006

Attached is the Office of the Inspector General analysis of recommendations as discussed in the agency's responses dated October 30, 2006, and December 20, 2006. Based on these responses, recommendations 1 and 2 are closed and recommendations 3, 5, and 6 remain in resolved status. Recommendation 4 was closed previously. Please provide an update on the status of the resolved recommendations by March 19, 2007.

If you have questions or concerns, please call me at 415-5915.

Attachment: As stated

cc: M. Johnson, OEDO
M. Malloy, OEDO
P. Tressler, OEDO

Audit Report

AUDIT OF NRC'S IMPLEMENTATION OF HOMELAND SECURITY PRESIDENTIAL DIRECTIVE-12 (HSPD-12) (OIG-06-A-20)

Status of Recommendations

Recommendation 1: Assign an individual or individuals to ensure that all PIV-I requirements are met prior to initiating a request to the issuer to produce and issue a badge.

Response dated
October 30, 2006:

Personnel Security Branch PIV Registrars are responsible for ensuring that all PIV-I requirements are met prior to initiating a request to the issuer to produce and issue a badge. To ensure that Registrars have a consistent understanding of their duties, Registrars completed a standardized training module that was developed for all government agencies to use to meet PIV requirements. This action was initially completed on October 27, 2005, and again on April 6, 2006, when a new Registrar was added.

The Division of Facilities and Security (DFS) currently uses the Personal Identity Verification (PIV) Sheet to ensure that all HSPD-12 PIV-I requirements are met. DFS expects to implement an updated version of this tool, the Personal Identity Verification and Credential Issuance Form (PIVCIF), which further defines the process and the steps for each PIV-I requirement after all Registrars have been trained on its use.

OIG Response:

OIG reviewed the PIV Sheet and the PIVCIF and found that both could serve as effective tracking tools to ensure the completion of PIV-I requirements. Use of these forms, in concert with the training provided to Registrars, provides assurance that the Registrars have the means to ensure that requirements are met prior to badge issuance. This recommendation is therefore closed.

Status:

Closed.

Audit Report

AUDIT OF NRC'S IMPLEMENTATION OF HOMELAND SECURITY PRESIDENTIAL DIRECTIVE-12 (HSPD-12) (OIG-06-A-20)

Status of Recommendations

<u>Recommendation 2:</u>	Require completion of the Personal Identity Verification Sheet to track the PIV-I process and use this form to initiate the badge request.
Response dated October 30, 2006:	<p>In the September 22, 2006, response to the OIG, staff proposed to revise the Case Summary Sheet to include the tracking information for the PIV-I process. After further evaluation of the OIG audit report and OIG Recommendation 2, it was determined that the PIV-I process should be tracked independently of the clearance process for applicants. Maintaining an independent PIV-I tracking process ensures that only those individuals approved for employment are processed for personal identity verification and credential issuance. A section has been added to the PIVCIF to be filled out and signed by the official responsible for Case Summary approvals for employment (i.e., Branch Chief, Personnel Security).</p> <p>The PIVCIF has been revised to address each step of the HSPD-12 PIV-I process. This ensures that both the Personnel Security Branch registrars and the Facilities Security Branch credential issuers address each of the pertinent HSPD-12 PIV-I requirements.</p>
OIG Response:	OIG reviewed the PIVCIF and determined that it includes each of the required steps in the PIV-I process as well as written guidance on how to use this tracking information to ensure that all necessary steps have been completed prior to initiation of the badge request. On December 12, 2006, the Deputy Director, DFS, confirmed that NRC was using the form to track the PIV-I process. This recommendation is therefore closed.
Status:	Closed.

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AUDIT OF NRC'S IMPLEMENTATION OF HOMELAND SECURITY PRESIDENTIAL DIRECTIVE-12 (HSPD-12) (OIG-06-A-20)

Status of Recommendations

<u>Recommendation 3:</u>	Provide NRC-specific HSPD-12 training to all individuals with roles in the process to ensure they understand their responsibilities and the process overall. This training should include the provision of written guidance, such as checklists of responsibilities, to all individuals with roles in the process.
Response dated October 30, 2006:	Detailed PIV-I procedures will be developed to provide further clarity on PIV-I operations and roles and responsibilities in the PIV-I process. The procedures and required training will be completed by February 1, 2007, to ensure that there is a clear understanding of the process, the procedures, and roles and responsibilities by all individuals with PIV-I responsibilities.
OIG Response:	The proposed corrective actions address the intent of the recommendation. This recommendation will be closed after OIG reviews the written guidance provided to staff and determines that it includes sufficient specifics to facilitate staff's clear understanding of their roles and responsibilities within the PIV-I process.
Status:	Resolved.

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AUDIT OF NRC'S IMPLEMENTATION OF HOMELAND SECURITY PRESIDENTIAL DIRECTIVE-12 (HSPD-12) (OIG-06-A-20)

Status of Recommendations

<u>Recommendation 5:</u>	Expand the HSPD-12 working group by including representation from all offices needed to facilitate a cost-effective PIV-II solution.
Response dated October 30, 2006:	The HSPD-12 working group will be expanded by including representation from all offices needed to facilitate a cost-effective PIV-II solution. In addition, an HSPD-12 Steering Committee will be established to ensure integrated agency implementation of HSPD-12 and provide executive direction and guidance to the HSPD-12 Working Group. A memorandum will be issued to Office Directors requesting the identification of participants for the Steering Committee and the Working Group.
OIG Response:	The proposed corrective action addresses the intent of this recommendation. This recommendation will be closed after OIG reviews the Steering Committee and Working Group membership to determine it includes representation from all offices needed to facilitate a cost-effective HSPD-12 solution.
Status:	Resolved.

Audit Report

AUDIT OF NRC'S IMPLEMENTATION OF HOMELAND SECURITY PRESIDENTIAL DIRECTIVE-12 (HSPD-12) (OIG-06-A-20)

Status of Recommendations

Recommendation 6: Formalize the HSPD-12 working group by developing a charter that defines the membership and expectations.

Response dated
December 20, 2006:

The Office of Administration (ADM) developed a draft HSPD-12 charter which defines the membership and expectations of an HSPD-12 Steering Committee and a Working Group. ADM sent a memorandum to the Office of the General Counsel (OGC), Chief Financial Officer, Office of Information Services (OIS), Office of Human Resources (HR), the Technical Training Center, and all four regions requesting that each designate an individual to participate in the HSPD-12 Working Group. The memorandum also asked that OGC, OIS, and HR designate an individual to participate in the Executive Steering Committee. ADM plans to have the Working Group review and revise the charter at its first meeting, and anticipates that the charter will be approved by the new Steering Committee and Working Group by February 28, 2007.

OIG Response: The proposed corrective action addresses the intent of this recommendation. This recommendation will be closed after OIG reviews the final charter and determines that it defines the group's membership and expectations.

Status: **Resolved.**