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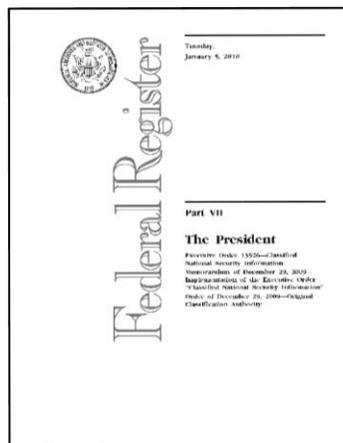


Homeland Security

EPA Improved Its National Security Information Program, but Some Improvements Still Needed

Report No. 16-P-0196

June 2, 2016



Report Contributors:

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Abbreviations

CFR	Code of Federal Regulations
EO	Executive Order
EPA	U.S. Environmental Protection Agency
ISOO	Information Security Oversight Office
NSI	National Security Information
OARM	Office of Administration and Resources Management
OCA	Original Classification Authority
OHS	Office of Homeland Security
OIG	Office of Inspector General
OPM	U.S. Office of Personnel Management
ORD	Office of Research and Development
SMD	Security Management Division

Cover photo: Cover page for Executive Order 13526, *Classified National Security Information*.

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At a Glance

Why We Did This Review

As required by Section 6(b)(2)(B) of the *Reducing Over-Classification Act*, we reviewed actions taken by the U.S. Environmental Protection Agency (EPA) to implement previous recommendations to improve policies and procedures related to the classification of national security information (NSI).

Executive Order 13526, *Classified National Security Information*, prescribes a uniform system for classifying, safeguarding and declassifying NSI. The unauthorized disclosure of the information could result in damage to the national security. The EPA's Office of Administration and Resources Management manages the agency's NSI program.

This report addresses the following EPA goal or cross-agency strategy:

- *Embracing EPA as a high-performing organization.*

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Listing of [OIG reports](#).

EPA Improved Its National Security Information Program, but Some Improvements Still Needed

What We Found

Between 2011 and 2013, we issued three reports and 12 recommendations to improve the EPA's NSI program. Based on those recommendations, the EPA improved its controls over the NSI program by including mandatory training, making nondisclosure agreements more readily available to employees with a security clearance, and standardizing performance requirements for employees with a security clearance.

The EPA will continue to improve its national security information program by completing information classification guides that can be used uniformly and consistently throughout the agency.

The EPA completed corrective actions to address all recommendations except for two related to classification guides. Of these two outstanding recommendations, the first calls on the EPA to ensure the preparation, review and approval of appropriate security classification guides, while the other recommends that the EPA ensure the distribution of classification guides to users of the EPA's originally classified information. The original milestone date for finalizing a classification guide approval process was September 30, 2014. According to the EPA, a classification guide is expected to be completed and approved by the Administrator within fiscal year 2016.

During the course of this follow-up review, we also found that it is taking longer to withdraw clearances after EPA employees leave the agency than it did at the time of our June 2012 report. However, adequate controls are in place to prevent former EPA clearance holders from accessing NSI.

Recommendations and Planned Agency Corrective Actions

We recommend that the Assistant Administrator for Administration and Resources Management establish controls to ensure that clearances are administratively withdrawn within 30 days of an employee leaving the EPA. The EPA agreed with our recommendation and provided acceptable corrective actions with a projected timeframe for completion. The report recommendation is resolved and open pending completion.



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

THE INSPECTOR GENERAL

June 2, 2016

MEMORANDUM

SUBJECT: EPA Improved Its National Security Information Program,
but Some Improvements Still Needed
Report No. 16-P-0196

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: Donna Vizian, Acting Assistant Administrator
Office of Administration and Resources Management

This is our report on the subject evaluation conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). The project number for this evaluation was OPE-FY15-0057. 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.

The EPA office having primary responsibility over the issues discussed in this report is the Office of Administration and Resources Management.

Action Required

You are not required to provide a written response to this final report because you provided agreed-to corrective actions and a planned completion date for the report recommendation. Should you choose to provide a final response, we will post your response on the OIG's public 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.

This report will be available at www.epa.gov/oig.

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Purpose

As required by Section 6(b)(2)(B) of the *Reducing Over-Classification Act* (P.L. 111-258), we reviewed actions taken by the U.S. Environmental Protection Agency (EPA) to improve policies and procedures related to the classification of national security information (NSI). The actions were identified in the three EPA Office of Inspector General (OIG) reports listed below, which were issued under Section 6(b)(1) of the act.

- *EPA Should Prepare and Distribute Security Classification Guides*, Report No. [11-P-0722](#), issued September 29, 2011.
- *EPA's National Security Information Program Could Be Improved*, Report No. [12-P-0543](#), issued June 18, 2012.
- *EPA Does Not Adequately Follow National Security Information Classification Standards*, Report No. [14-P-0017](#), issued November 15, 2013.

The act required the Inspector General of each department or agency of the United States with an officer or employee who is authorized to make original classifications, in consultation with the Information Security Oversight Office (ISOO), to (1) assess whether applicable classification policies, procedures, rules and regulations have been adopted, followed and effectively administered within the organization; and (2) identify policies, procedures, rules, regulations or management practices that may be contributing to persistent misclassification of material within the organization.

Background

National Security Information Must Be Protected

Executive orders (EOs) since 1940 have directed governmentwide information classification standards and procedures. Such programs must comply with EO 13526, *Classified National Security Information*, which established the current principles, policies and procedures for classification. The EO prescribes a uniform system for classifying, safeguarding and declassifying NSI. EO 13526 expresses the President's belief that this nation's progress depends on the free flow of information, both within the government and to the American people. Accordingly, protecting information critical to national security and demonstrating a commitment to open government through accurate and accountable application of classification standards and routine, secure and effective declassification are equally important priorities.

EO 13526 is implemented through regulations in the Code of Federal Regulations (CFR) in 32 CFR Part 2001. Among other things, the regulations provide for information to be classified by either an original classification authority (OCA) or

derivatively. OCAs are individuals authorized in writing—either by the President, Vice President, agency heads or other officials designated by the President—to initially classify information. The EPA Administrator serves as the EPA’s sole OCA. All personnel with an appropriate security clearance can perform derivative classification unless an agency limits this activity to specific personnel. Information may be derivatively classified from a source document or as directed by a classification guide.

The ISOO is responsible for policy and oversight of the governmentwide security classification system and the National Industrial Security Program. ISOO is a component of the National Archives and Records Administration and receives policy and program guidance from the National Security Council.

EPA Has a Program to Classify and Protect NSI

The EPA has had a program to safeguard classified NSI since 1972, although ISOO considers the amount of classification activity to be minute. The EPA creates, receives, handles and stores classified material because of its homeland security, emergency response and continuity missions. The Assistant Administrator for the Office of Administration and Resources Management (OARM) has been delegated overall authority for the NSI program. The Assistant Administrator may, and has, delegated much of this authority to OARM’s Security Management Division (SMD) within OARM’s Office of Administration. SMD created an NSI program team to manage the program. All major EPA offices assigned at least one employee to coordinate the program at their organization. The EPA’s *National Security Information Handbook* identifies the official policies, standards and procedures for EPA employees and nonfederal personnel who have access to classified NSI.

Although the EPA has a process for making original classification decisions, including approving security classification guides, there are no timelines associated with the process. The key steps in the current approval process are:

- The EPA program office creates and marks the document.
- SMD performs an administrative review.
- The Office of Homeland Security (OHS) within the Office of the Administrator evaluates the classification levels assigned.
- The EPA Administrator makes an original classification decision.

Responsible Offices

OARM, OHS, and the Office of Research and Development (ORD) were responsible for completing corrective actions in response to recommendations included in the OIG’s three prior reports.

Scope and Methodology

We performed our audit from August 2015 through April 2016. 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 objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

To review progress made pursuant to the results of the first evaluation required by the *Reducing Over-Classification Act*, we obtained information (primarily from OARM) supporting that the agreed-upon corrective actions were completed. We also took steps to confirm that some of the completed actions corrected the reported conditions to ensure the EPA is fully complying with NSI program requirements. We did not reexamine the derivatively classified documents to determine whether the proper classification markings were applied because the EPA had already established an internal review function that disclosed similar discrepancies in our prior review.

Results of Review

The three reports issued by the OIG under the *Reducing Over-Classification Act* contained a total of 12 recommendations. EPA officials and the OIG agreed on corrective actions for all 12. Actions were completed for 10 of the 12 recommendations. The two remaining recommendations pertain to approving and distributing classification guides. Actions are underway to complete these recommendations. Details on what we found follow.

EPA Should Prepare and Distribute Security Classification Guides, Report No. [11-P-0722](#), Issued September 29, 2011

At the time of this report, the EPA had not established any official classification guides even though EPA Administrators had taken original classification actions. Original classification actions involve someone with original classification authority assigning a classification level to a particular document. According to the NSI program team leader, classification guides had not been prepared because EPA Administrators have only classified a few documents. Executive Order 13526 states that agencies with original classification authority shall prepare classification guides to facilitate the proper and uniform derivative classification of information. Further, the EPA's *National Security Information Handbook* requires that a declassification guide be developed for each system, plan, program or project that involves classified information. The EPA's guidance, at the time the OIG issued its report in 2011, noted that classification guides can also serve as declassification guides. Without classification guides, EPA staff and other users of the EPA's classified information may not be

uniformly and consistently identifying information for classification, or classifying information in a uniform and consistent manner. Ultimately, information that should be identified for safeguarding could be unintentionally released, resulting in harm to national security. Therefore, the lack of classification guides remains a material internal control weakness in the EPA’s classified NSI program.

Table 1: Report No. 11-P-0722 status

OIG recommendations	Status of corrective actions	Notes
1. Ensure the preparation, review, and approval of appropriate security classification guides that conform to the requirements of EO 13526, <i>Classified National Security Information</i> , and EPA’s <i>National Security Information Handbook</i> .	IN PROGRESS	Action Official: Administrator (delegated to OARM) This corrective action has been delayed due to extensive, collaborative stakeholder involvement and review. According to the EPA, the guide has undergone several revisions within the past year and is expected to be completed and approved by the Administrator within fiscal year 2016.
2. Ensure the distribution of classification guides to users of the EPA’s originally classified information and to program offices that work in related subject areas.	IN PROGRESS	Action Official: Administrator (delegated to OARM) The corrective action is pending, since a classification guide must be signed by the Original Classification Authority (the Administrator) prior to distribution.

Source: OIG analysis.

EPA’s National Security Information Program Could Be Improved, Report No. [12-P-0543](#), Issued June 18, 2012

Under its classified NSI program, the EPA has assigned responsibilities and provided guidance, training and oversight. EPA program offices provided secure equipment and space, following NSI program specifications. The EPA had procedures in place so employees could obtain security clearances and classify information. Annual reports were prepared on the status of the program. Thus, the EPA could create, receive, handle and store classified material needed to fulfill its responsibilities related to its homeland security, emergency response and continuity missions.

We found that the EPA’s NSI program needed improved internal controls to address the following deficiencies:

- Although the EPA kept three copies of an employee’s signed *Classified Information Nondisclosure Agreement*, Standard Form 312,

it did not store a copy in the employee’s Official Personnel Folder, as provided in guidance from the U.S. Office of Personnel Management (OPM). OPM’s regulation requires that personnel records be maintained in accordance with OPM guidance.

- Not all individuals with an EPA security clearance were completing the required annual refresher training.
- The EPA did not always promptly withdraw a clearance when an employee left the EPA, which may result in a person accessing classified NSI to which he or she is no longer privileged.
- The EPA regulation, policies and basic guidance document for the NSI program did not reflect the current governmentwide requirements, and the basic guidance document is currently not an agencywide directive even though it affects the entire EPA.

Table 2: Report No. 12-P-0543 status

OIG recommendation	Status of corrective actions	Notes
1. Issue a directive to establish controls that address the following deficiencies identified in this report: <ul style="list-style-type: none"> • Put the signed Standard Form 312 in the employee’s Official Personnel Folder. • Ensure that those with an EPA security clearance complete the annual refresher training. • Promptly withdraw a clearance when a cleared employee leaves EPA. 	COMPLETED	Action Official: OARM.

Source: OIG analysis.

Although the EPA has increased the percentage of those employees being debriefed before or at the time of departing the EPA, not all those who leave the EPA receive a termination briefing. On average, SMD has increased the number of employees who have their security clearances withdrawn before or at the time they leave the EPA. In our sample of 36 cleared employees who left the EPA, 26 employees (approximately 72 percent) were debriefed before or on the day of their departure. The remaining 10 employees (approximately 28 percent) had their clearances administratively withdrawn after leaving the EPA. For those 10 employees, it took an average of 106 days to administratively withdraw their security clearances. In OIG Report No. 12-P-0543, we reported it taking an average of 60 days to have a clearance withdrawn after leaving the agency.

At present there are two main mechanisms that alert SMD to withdraw an employee's security clearance: (1) employees notify the NSI representative or the NSI program that they are separating from the agency or if their duties no longer require access to classified information, or (2) every morning SMD receives a report from the EPA's human resources line of business that includes terminated employees. Cleared employees were notified in the 2015 mandatory annual refresher training that their responsibilities include: "Reporting changes in job position, duties, retirements, or a planned departure from the agency." However, the EPA needs to implement controls to ensure that clearances are promptly withdrawn for departed employees.

If the clearance is not withdrawn, the employee's name incorrectly remains on the list of those with clearances. As a consequence, the employee could potentially access classified NSI to which he or she is no longer privileged. The NSI representatives consult the list before granting access to classified information. Each week, the EPA provides its clearance list to OPM so it can be included in the Central Verification System. Based on information in the system, another agency might grant someone unauthorized access to protected information.

EPA Does Not Adequately Follow National Security Information Classification Standards, Report No. [14-P-0017](#), Issued November 15, 2013

Our review of both originally and derivatively classified documents generated by three offices found that the EPA did not sufficiently follow national security information classification standards.

Of the two originally classified documents we reviewed, portions of one needed different classification levels, and the other contained numerical data that was incorrectly transferred from another document. The National Homeland Security Research Center in ORD agreed to correct the documents. We also noted that the approved classification guide and the three guides under review had narrow scopes, which limits their usefulness. At the time, the three proposed guides had been in the approval process for 12 months. Additionally, the declassification process needed clarity since the one pending declassification request had also been in the approval process for almost a year when it should take no more than 60 days.

None of the 19 derivatively classified documents we reviewed completely met the requirements of EO 13526 and the implementing regulations. The derivative classifiers did not include some required information and did not correctly transfer information from the source documents. As a result, those who later access the information may not know how to protect it or be able to properly identify or use it as a source for their own derivative decision. A lack

of training for derivative classifiers and incorrect information in the annual refresher training given to all clearance holders contributed to the classification problems noted. The EPA had not promptly updated guidance. Not all cleared employees who needed an element relating to designation and management of classified information as part of their performance evaluation had such an element.

Table 3: Report No. 14-P-0017 status

OIG recommendations	Status of corrective actions	Notes
1. Work with the Office of Research and Development to: <ul style="list-style-type: none"> a. Correct the marking errors in the two originally classified documents reviewed by the OIG (the scientific report and security classification guide). b. Change the classification levels for portions of the scientific report. c. Correct the security classification guide. 	COMPLETED	Action Official: OARM
2. Provide annual OCA training to the Administrator that complies with the regulatory requirements.	COMPLETED	Action Official: OARM
3. Develop a process for declassifying, within 60 days, information classified by the EPA.	COMPLETED	Action Official: OARM
4. Work with the Assistant Administrator for OARM to develop a process for approving classification guides within the 30 days specified in EO 13526.	COMPLETED	Action Official: OHS
5. Submit to the NSI program team a single, unclassified classification guide that covers both past and future EPA scientific research to replace the multiple guides.	COMPLETED	Action Official: ORD

OIG recommendations	Status of corrective actions	Notes
<p>6. Assist the appropriate EPA organizations in bringing the derivative documents reviewed by the OIG into compliance with EO 13526 and 32 CFR Part 2001. For example:</p> <ul style="list-style-type: none"> a. Attach or incorporate a source document list if derived from multiple sources. b. Correct the classification blocks to include the name and position or personal identifier of the derivative classifier. c. Declassify proposal reviews and other documents deemed over-classified. d. Convert derivatively classified documents to original classifications. e. Ensure consistency in portion marks from sources applied to original documents. 	COMPLETED	Action Official: OARM
<p>7. Provide NSI annual refresher training that is consistent with regulatory requirements.</p>	COMPLETED	Action Official: OARM
<p>8. Enforce the requirements in 32 CFR 2001.71(d) regarding derivative classifier training.</p>	COMPLETED	Action Official: OARM
<p>9. Remind the heads of EPA organizations that their staff who hold a security clearance should have included in their performance evaluation a critical element or item on the designation and management of classified information if the individual is a security manager or specialist or has duties that significantly involve creating or handling classified information (e.g., NSI representatives).</p>	COMPLETED	Action Official: OARM

Source: OIG analysis.

Conclusions

The EPA has improved its controls over the NSI program in the following ways:

- As required by OPM regulations, the EPA is following OPM's guidance to put the signed copy of an employee's Standard Form 312, Classified Information Nondisclosure Agreement, in their Official Personnel Folder.
- OARM is better monitoring completion of the required annual refresher training and withdrawing the clearances of those who do not complete it.
- OARM is withdrawing a greater percentage of clearances before or at the time employees leave the EPA.
- OARM provided annual OCA training to the Administrator.
- OARM provided derivative classifier training and monitored its completion.
- OARM provided standard wording for a critical job element to be part of the performance evaluation of those with a security clearance.
- OHS, in collaboration with OARM, developed a Standard Operating Procedure for the classification guide approval process.

However, it is taking longer to withdraw clearances after employees leave the agency than it did at the time of our June 2012 report.

Recommendation

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

1. Establish controls to ensure that clearances are administratively withdrawn within 30 days of an employee leaving the EPA.

Agency Response and OIG Evaluation

The EPA agreed with our recommendation and provided acceptable corrective actions with a projected timeframe for completion. The report recommendation is resolved and open pending completion. We made revisions to the report to address the agency's comments where appropriate. Appendix A contains the agency's complete response to our draft report.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Claimed Amount	Agreed-To Amount
1	9	Establish controls to ensure that clearances are administratively withdrawn within 30 days of an employee leaving the EPA.	O	Assistant Administrator for Administration and Resources Management	8/31/16		

¹ O = Recommendation is open with agreed-to corrective actions pending.
 C = Recommendation is closed with all agreed-to actions completed.
 U = Recommendation is unresolved with resolution efforts in progress.

Agency Comments on Draft Report

May 14, 2016

MEMORANDUM

SUBJECT: Response to Office of Inspector General Draft Report No. OPE-FY15-0057: “EPA Improved Its National Security Information Program, But Some Improvements Still Needed,” dated April 5, 2016

FROM: Donna J. Vizian, Acting Assistant Administrator /s/

TO: Carolyn Copper, Assistant Inspector General
Office of Program Evaluation
Office of Inspector General

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 recommendation and planned corrective actions.

AGENCY’S OVERALL POSITION

The agency agrees with the Office of Inspector General recommendation to establish controls to ensure that clearances are administratively withdrawn within 30 days of employees leaving the U.S. Environmental Protection Agency. The Office of Administration and Resources Management, Office of Administration, Security Management Division is streamlining the clearance withdrawal process and expanding stakeholder outreach regarding the importance of notifying the NSI Team when employees are planning to leave the agency. The Security Management Division’s ability to withdraw clearances in a timely manner is dependent on the National Security Information Team knowing who is leaving and when.

The audit report’s conclusions section (p. 9) refers to an incomplete recommendation from a previous Audit Report No. 14-P-0017, “EPA Does Not Adequately Follow National Security Information Classification Standards,” dated November 15, 2013. That recommendation, “Work with the Assistant Administrator for OARM to develop a process for approving classification guides within the 30 days specified in E.O. 13526,” has now been completed by the OARM and the Office of Homeland Security with guidance from the Office of General Counsel. The OARM has submitted the appropriate documentation for inclusion in the Management Audit Tracking System. We request that the recommendation not be reported as “unimplemented” to Congress.

AGENCY’S RESPONSE TO REPORT RECOMMENDATION

No.	Recommendation	High-Level Corrective Actions	Estimated Completion
1	Establish controls to ensure that clearances are administratively withdrawn within 30 days of an employee leaving the EPA.	<p><u>Planned process changes:</u> Update clearance termination SOP to include the 30-day deadline; streamline PSB withdrawal of clearances in the Personnel Security System; provide incremental uploads to OPM’s Central Verification System by Friday of each week.</p> <p><u>Planned outreach:</u> Send reminders to ARAs, NSI Representatives, and HR offices about the NSI Team’s need to be notified when employees are leaving the agency.</p>	August 31, 2016

CONTACT INFORMATION

If you have any questions regarding this response, please contact Kelly Glazier, Director of the Security Management Division, Office of Administration, Office of Administration and Resources Management, at (202) 564-0351.

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