

FY 2014 ANNUAL PERFORMANCE REPORT PROGRAM EVALUATIONS

Goal	Evaluation Title/Evaluator/ Public Access	Scope or Key Questions	Findings	Recommendations and EPA Response
1	<p><i>Audits on EPA Recovery Act Funded Diesel Emissions Reduction Act Assistance Agreements Reported Programmatic and Management Challenges</i></p> <p>OIG</p> <p>Report No. 14-R-0355, September 14, 2014, http://www.epa.gov/oig/reports/2014/20140915-14-R-0355.pdf</p>	<p>To ensure that federal funds were properly administered through Diesel Emissions Reduction Act (DERA) assistance agreements under the American Recovery and Reinvestment Act.</p>	<p>Documentation of grant activities is not always sufficient to demonstrate that funded work met requirements for emissions reductions; results in uncertain EPA estimates of emissions reductions. Also, EPA funds were used to replace vehicles that were to be replaced on account of normal attrition.</p>	<p>Previous OIG audits included recommendations for EPA to improve oversight to ensure that grant activities achieve their planned emissions reductions; issue supplemental guidance on accurately reporting activities and their results; and clarify when vehicle replacements are considered normal attrition, not eligible for DERA funding.</p> <p>EPA Response: EPA’s Office of Air and Radiation (OAR) provided additional information on the DERA program’s activities since the grants were awarded in 2009. OAR said it has strengthened the DERA program over the past five years and addressed many of the issues identified in the prior audits. OAR revised the methodologies for emissions reporting (http://www.epa.gov/cleandiesel/documents/report-nat-final-p2-rev3.xls), instituted annual project officer and</p>

				grantee training, created technical guidance related to DERA-specific assistance agreement management (http://www.epa.gov/cleandiesel/documents/420p11001.pdf), and continued baseline and advanced monitoring of emissions reductions.
1	<p><i>Follow-Up Report: EPA Improves Management of Its Radiation Monitoring System</i></p> <p>OIG</p> <p>Report No. 14-P-0321, July 22, 2014, http://www.epa.gov/oig/reports/2014/20140722-14-P-0321.pdf</p>	<p>To review the status of corrective actions for seven recommendations as first reported in OIG Report No. 12-P-0417, <i>Weaknesses in EPA's Management of the Radiation Network System Demand Attention</i> (April 19, 2012), and tracked in EPA's Management Audit Tracking System (MATS).</p>	<p>OAR completed corrective actions based on OIG's recommendations and has recorded its efforts in MATS. These efforts have increased the coverage and effectiveness of the stationary air-monitoring network. Since the OIG's April 2012 report, EPA has added eight monitors to the network, for a total of 132. The National Analytical Radiation Environmental Laboratory (NAREL) has eight more air monitors available for installation, which will bring the network total up to 140. Paducah, Kentucky, and Columbia, South Carolina, have already been chosen as locations for the additional monitors; the locations for the other six are being assessed. NAREL has increased RadNet's operational readiness. Analysis of weekly status</p>	<p>Corrective actions have been taken and no further response is required.</p>

			reports provided by NAREL covering a 73-week period ending with the week of February 17, 2014, showed that an average of 92.9 percent of the air monitors were operational, up from 80 percent in March 2011. Completing the corrective actions has improved EPA's ability to monitor and assess large-scale atmospheric releases of radiation.	
2	<p><i>More Action Is Needed to Protect Water Resources from Unmonitored Hazardous Chemicals</i></p> <p>OIG</p> <p>Report No. 14-P-0363, September 29, 2014, http://www.epa.gov/oig/reports/2014/20140929-14-P-0363.pdf</p>	To evaluate the effectiveness of EPA's programs in preventing and addressing the contamination of surface water from hazardous wastes passing through publicly owned treatment works (POTWs).	EPA's regulations and management controls are ineffective in controlling hundreds of hazardous chemicals entering and discharging from POTWs; sewage treatment plant staff do not monitor for hazardous chemicals discharged by industrial users; and the EPA may not be aware of chemical discharges or toxicity exceedances that should be addressed to minimize potentially harmful contamination of water resources.	<p>OIG recommended that EPA develop a format for sharing annual Toxics Release Inventory data among industries discharging to POTWs, develop a list of chemicals beyond the priority pollutant list for inclusion in permits, confirm compliance with the hazardous waste notification requirement, and track required submittals of toxicity tests and violations.</p> <p>EPA Response: The EPA has designed the Discharge Monitoring Report Pollutant Loading Tool to provide access to surface water discharge and other data; the tool's capability will be expanded to extract data specific to discharges to municipal sewage treatment works. EPA will issue guidance for industrial</p>

				users to comply with hazardous waste reporting requirements and for municipalities' use of the information. EPA will describe best practices for how National Primary Discharge Elimination Systems (NPDES) permit writers and the pretreatment programs use these reports to assess discharge of these pollutants and to protect water resources. EPA will provide training to explain the importance of the effluent toxicity permit requirements.
2	<p><i>EPA Needs to Continue to Improve Controls for Improper Payment Identification</i></p> <p>OIG</p> <p>Report 14-P-0171, April 10, 2014, http://www.epa.gov/oig/reports/2014/20140410-14-P-0171.pdf</p>	<p>To evaluate EPA's compliance with the Improper Payments Elimination and Recovery Improvement Act of 2012, specific to payments made under the Clean Water and Drinking Water State Revolving Funds. In this evaluation, the IG limited its assessment to the EPA's compliance with the Improper Payments Elimination and Recovery Act (IPERA) of 2010. In addition, the IG evaluated EPA's performance in reporting under the law, and in reducing and recapturing</p>	<p>During FY 13, EPA was compliant with improper payment reporting requirements in the IPERA. However, the IG found several inconsistencies in regional data on improper payments; for example, there were differences in the improper payment amounts on "transaction testing" worksheets and in the Agency Financial Report (AFR). EPA regional offices did not follow State Revolving Fund (SRF) standard operating procedures in completing required fields in the "transaction testing" worksheet. The IG also found that EPA did not accurately report its recovery of SRF</p>	<p>OIG recommended that the Office of Water (OW) work with the regions to find and address the issues that created inconsistencies in their improper payment amounts in their "transaction testing" worksheets and in the AFR. The IG also recommended providing regional staff with instructions for completing the most current "transaction testing" worksheet and requiring regional staff to review a sample of large negative draws to identify improper payments. Finally, the IG recommended that a system be established for tracking the recovery of improper payments, and that disallowed costs in the compliance database be reconciled with accounts receivable in the financial system.</p> <p>EPA Response: OW continues to</p>

		<p>improper payments in the SRFs.</p>	<p>improper payments in the AFR. There is no formal mechanism to track improper payment recovery of SRF money. It is not included in the transaction testing worksheet. EPA understated the improper payments for grants in the FY 2013 AFR because accounts receivable and disallowed costs were not reconciled prior to reporting.</p>	<p>work with the regions to ensure that improper payment reporting is accurate and well documented. Results of the FY 2013 review of improper payments were reported to the Office of the Chief Financial Officer (OCFO) in the SRF end-of-year reports; reviews continue on an ongoing annual basis over the course of transaction testing. OW has also improved coordination with the OCFO in reporting for the AFR. OW has revised the transaction testing standard operating procedures to include a process for tracking the recovery of improper payments. It maintains a tracking spreadsheet of all recoveries, including the origination of an accounts receivable for excess funds not returned to EPA. OW has incorporated tracking of the recovery of funds into the transaction testing spreadsheet.</p>
2	<p><i>Great Lakes Restoration Initiative: Further Actions Would Result in More Useful Assessments and Help Address Factors That Limit Progress</i></p> <p>GAO</p>	<p>To review the Great Lakes Restoration Initiative (GLRI) in light of the significant federal funds targeted toward environmental restoration around the Great Lakes. The following key issues were addressed:</p>	<p>EPA needs to produce more comprehensive and useful GLRI performance assessments, incorporating progress toward its Action Plan's long-term goals and objectives. The assessments should account for factors outside the Action Plan's scope that might affect the GLRI's</p>	<p>In its <i>GLRI Report to Congress and the President</i>, GAO recommended the Great Lakes Program report on progress toward its long-term goals and objectives. Along with developing appropriate performance measures, the program should improve its information systems. It also needs to improve its assessment of projects that are not linked to specific performance</p>

	<p>Report No. GAO-13-797, November 8, 2013, http://www.gao.gov/assets/660/658265.pdf</p>	<ul style="list-style-type: none"> • How the GLRI is implemented by the Task Force agencies and other stakeholders. • The methods that EPA has in place to assess GLRI progress. • The progress identified by the Task Force agencies and nonfederal stakeholders. • The views of nonfederal stakeholders on factors, if any, that may affect or limit GLRI progress. 	<p>long-term success.</p>	<p>measures, and develop a science-based adaptive management framework for Great Lakes restoration. The program should account for factors outside the scope of the action plan, like climate change, that may affect GLRI's long-term success.</p> <p>EPA Response: EPA agreed to GAO's conclusions and recommendations, and is incorporating all the changes into its <i>FY 2014 GLRI Report to Congress and the President</i>.</p>
<p>2</p>	<p><i>EPA Program to Protect Underground Sources from Injection of Fluids Associated with Oil and Gas Production Needs Improvement</i></p> <p>GAO</p> <p>Report No. GAO-14-555, June 2014, http://www.gao.gov/assets/670/664499.pdf</p>	<p>To review EPA's oversight of the Class II Underground Injection Control (UIC) program associated with oil and gas production. The following key issues were addressed:</p> <ul style="list-style-type: none"> • EPA and state roles, responsibilities, and resources for the program. • Safeguards to protect drinking water. 	<p>To meet its responsibilities to oversee safe underground injection into Class II wells of fluids associated with oil and gas production, EPA needs sufficient national monitoring data. Also, EPA state UIC programs need information on the risks posed to underground drinking water sources by underground injection. As domestic oil and gas production soars and the demand for underground injection wells increases, with limited EPA</p>	<p>GAO recommends four specific actions to ensure that EPA's oversight of the Class II UIC is effective at protecting drinking water sources from the underground injection of large amounts of wastewater produced with increasing domestic oil and gas production:</p> <ul style="list-style-type: none"> • Task the UIC Technical Working Group with reviewing emerging risks and related program safeguards, including over-pressurization of formations and information on use of diesel in

		<ul style="list-style-type: none"> • EPA oversight and enforcement of Class II Programs. • The reliability of Class II Program data for reporting. 	<p>resources directed toward monitoring, maintaining sufficient oversight is a tremendous challenge. States have been partners with EPA in managing their UIC programs, yet face similar budgetary constraints.</p>	<p>hydraulic fracturing.</p> <ul style="list-style-type: none"> • Evaluate (and, as needed, revise) UIC program guidance on effective oversight to identify essential activities that EPA Headquarters and Regions need to conduct. • Codify state UIC program requirements into federal regulations so EPA maintains enforcement authority of state programs. • Develop and implement a protocol to ensure that data collected from the states' and EPA-managed Class II programs are complete and comparable for purposes of reporting at the national level. <p>EPA Response: EPA generally agrees with GAO's analysis and findings. EPA is modernizing its well inventory and compliance data. The Agency is committed to improving the process to review, approve, and codify state regulatory changes so that they are adequately enforced. EPA generally agrees that oversight and data management are two long-term challenges.</p> <p>EPA has tasked the Technical Working Group (TWG) to examine relevant overpressurization and induced seismicity issues and the</p>
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2	<p><i>Drinking Water: Characterization of Injected Fluids Associated with Oil and Gas Production</i></p> <p>GAO</p> <p>Report No. GAO-14-857R Drinking Water, September 23, 2014, http://www.gao.gov/assets/670/666048.pdf</p>	<p>To describe what information EPA and states collect from Class II well operators on the characteristics of injected fluids (supplements GAO-14-555; see above entry).</p>	<p>GAO found that information collected by EPA and selected states on the characteristics of fluids injected into Class II wells varies.</p>	<p>No further response needed.</p>
2	<p><i>EPA Has Improved Its Unregulated Contaminant Monitoring Program, But Additional Action Is Needed</i></p> <p>GAO</p>	<p>To review the status of EPA’s response to prior 2011 recommendations, and to identify opportunities for further program improvements. Two key issues also were addressed:</p>	<p>GAO noted that EPA has effectively addressed all of the recommendations from GAO’s 2011 report.</p>	<p>GAO identified a number of opportunities for further improvements to the program, and several “matters for Congressional consideration.” The following primary recommendations were directed to EPA:</p> <ul style="list-style-type: none"> • Vary the monitoring frequency for

	<p>Report No. GAO-14-103, February 10, 2014, http://www.gao.gov/products/gao-14-103.pdf</p>	<ul style="list-style-type: none"> • The factors EPA considered when it chose the current (UCMR 3) contaminants and the limitations, if any, it faced in choosing them. • The extent to which the UCMR data support drinking water regulatory determinations. 		<p>public water systems when the standard monitoring frequency is not expected to accurately depict the presence of contaminants.</p> <ul style="list-style-type: none"> • Further consider the adequacy of data collected under prior UCMR monitoring when evaluating candidate contaminants for future monitoring. • Evaluate opportunities to improve the timeliness of the UCMR program. <p>EPA Response: EPA is considering each of the GAO recommendations as it develops the proposal for the next cycle of unregulated contaminant monitoring (UCMR 4). The Agency expects to propose a rule in mid-2015 and to publish the final rule in late 2016.</p>
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<p>3</p>	<p><i>Improving the Use of Data/Evidence in the Office of Solid Waste and Emergency Response Planning and Budgeting Process</i></p> <p>Internal analysis</p> <p>Spring 2014</p>	<p>To assess the Office of Solid Waste and Emergency Response’s (OSWER’s) current use of data and evidence of program impact and effectiveness in planning and budgeting, and make recommendations for improving it.</p>	<p>Finding: OSWER’s current planning and budget process does not include a specific time during the year for senior managers to:</p> <ul style="list-style-type: none"> • Collect and review data, analyses, and evidence to determine what they tell us about our programs’ effectiveness; the risks we are addressing; or the human health, environmental, and community outcomes we are achieving. • Use this information as a key driver in OSWER-wide resource decisions. • Identify critical gaps in OSWER evidence. • Ensure that OSWER data and analyses are used as building blocks for developing more evidence over time. <p>Finding: OSWER offices clearly value strong data and evidence of program effectiveness and impact, but OSWER currently has a limited amount of this type of information available for</p>	<p>Recommendation 1: Use the end-of-year reporting processes to collect a meaningful set of OSWER-wide data/evidence that can be used in OSWER’s planning and budgeting processes. Only collect data/evidence that OSWER senior managers agree would be useful to review in planning for upcoming resource decisions.</p> <p>Recommendation 2: Add a step in the process for OSWER to hold a senior leader review of data/evidence to discuss important questions about program performance and resource needs. This review should be structured to give program offices an incentive to build a base of evidence and use it to drive performance over time.</p> <p>OSWER Response: In May 2014, the office implemented one of the key recommended improvements and held its first annual “Senior Leader Review of Data and Evidence.” In this review, the Assistant Administrator/Deputy Assistant Administrator, Office Directors and Deputies, as well as the lead region division directors, met to discuss strategic gaps in OSWER’s knowledge of program effectiveness and impact. Two of the most critical gaps in OSWER’s knowledge were</p>
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3	<p><i>Quantifying the Benefits of the RCRA Program</i></p> <p>Internal analysis</p> <p>Ongoing</p>	<p>To assess the benefits and economic impacts of the Resource Conservation and Recovery Act (RCRA) program by collecting and analyzing available data and information.</p>	<p>Analyses included:</p> <ul style="list-style-type: none"> • A characterization of the universe, scope, and reach of the RCRA program based on numbers of facilities regulated, spatial distribution, and demographics. • Waste generation and waste management trends over 	<p>OSWER is currently reviewing the analyses that have been prepared and will be making decisions regarding additional analytic work to undertake to strengthen its ability to establish priorities based on evidence of the impact and effectiveness of RCRA programs.</p>

			<p>time, including recycling and recovery of materials.</p> <ul style="list-style-type: none"> • Economic profile of the hazardous waste-generating sectors. • Estimates of the benefits of groundwater protection from the landfill program. • Estimates of the life cycle benefits from recycling and recovery of municipal solid wastes and other waste streams. 	
3	<p><i>Understanding the Communities OSWER Serves</i></p> <p>Internal analysis</p> <p>January 2014</p>	<p>To help OSWER understand the communities it works in by collecting data and information on the populations living within 1 and 3 miles of EPA's Superfund, RCRA Corrective Action (CA), and Brownfield sites.</p>	<p>OSWER found that approximately 156 million people live within 3 miles of these sites (roughly 51 percent) of the U.S. population, including approximately 52 percent of all children in the United States under the age of 5.</p> <p>While there is no single way to characterize communities near our sites, the population within 3 miles of the sites is more minority, lower-income, more linguistically isolated, and less likely to have a high school education than the U.S. population as a whole.</p>	<p>OSWER plans to update this information every two years and use it to improve how OSWER works and communicates with communities surrounding its cleanup sites.</p>

<p>3</p>	<p><i>Evaluating the Effectiveness and Efficiency of EPA's Region 2's Resource Conservation and Recovery Act Corrective Action Program</i></p> <p>Internal program evaluation (Region 2 and the Office of Policy's Evaluation Support Division)</p> <p>September 2013</p> <p>http://www.epa.gov/evaluate/pdf/waste/eval-r2-rcra-ca-program.pdf</p>	<p>To identify opportunities for improving the effectiveness and efficiency of the RCRA CA Program in Region 2.</p>	<p>The evaluation explored issues such as the timeliness of remedy decisions, the efficiency of federally managed vs. state-managed sites, the effectiveness of resource allocation, the use of enforcement actions to prevent noncompliance, the stringency of interim and final remedy decisions, and the effectiveness of public participation.</p>	<p>The evaluation identified five areas for improvement, which Region 2 will consider and use, where appropriate, in implementing the program over the next few years.</p>
<p>3</p>	<p><i>Brownfields Revolving Loan Fund Program Analysis</i></p> <p>Internal analysis</p> <p>Ongoing</p>	<p>To establish a baseline of data and information characterizing the Revolving Loan Fund (RLF) Program in order to identify factors contributing to high-performing RLFs and low-performing RLFs.</p> <p>Key evaluation questions:</p> <ul style="list-style-type: none"> • Who are the RLF grantees and what are the unliquidated 	<p>The analysis identified approximately 140 active RLFs with approximately \$140 million in capital in communities. 75 percent of RLFs are performing as expected; 25 percent are under-performing.</p>	<p>Several factors contribute to under-performance; OSWER will continue to evaluate these and use them to identify tools and resources to assist under-performing RLFs.</p> <p>OSWER will also use the findings to prioritize and support funding decisions and assist both high-performing and under-performing RLFs to cleanup brownfield sites.</p>

		<p>obligations sitting on these grants?</p> <ul style="list-style-type: none"> • What is the subgrant to loan ratio and how many subgrant waivers is the Program granting each year? • What is the effectiveness of subgrants vs. loans? • Who are the high-performing RLFs and what contributes to their performance? • Who are the low-performing RLFs and what challenges are they facing? 		
4	<p><i>EPA Can Help Consumers Identify Household and Other Products with Safer Chemicals by Strengthening Its “Design for the Environment” Program</i></p> <p>OIG</p> <p>Report No. 14-P-0349, September 9, 2014, http://www.epa.gov/oig/reports/2014/20140909-</p>	<p>To determine how effectively the Design for the Environment (DfE) Program highlights safer products for consumer use, and how can the program be strengthened and improved.</p>	<p>GAO found there is a potential for consumer misinterpretation of DfE’s logo, and for its misuse by former program participants. EPA’s DfE website has unsupported program benefit claims. Also, there are weaknesses in how EPA measures DfE program results.</p>	<p>GAO recommends that EPA:</p> <ul style="list-style-type: none"> • Redesign the DfE logo to better convey the program’s objective and avoid the appearance of an EPA endorsement. • Periodically review participants’ compliance with the partnership agreement regarding the use of DfE disclaimers and labeling requirements. • Institute controls to ensure removal of the DfE logo from former participants’ websites. • Address other noncompliance issues

	14-P-0349.pdf			<p>discovered as a result of program reviews.</p> <ul style="list-style-type: none"> • Remove website statements suggesting EPA has determined DfE products are cost-effective, unless there is valid supporting evidence. • Develop robust, transparent, and adequately supported program performance measures. <p>EPA Response: Please see OIG final report No. 14-P-0349, September 9, 2014, Appendix A (Agency Response to Draft Report).</p>
4	<p>“Regulatory and Resource Limitations Constrain the EPA’s Assessment of Chemical Risks”</p> <p>OIG and Office of General Counsel</p> <p><i>The EPA’s Fiscal Year Management Challenges</i>, May 28, 2014, http://www.epa.gov/oig/reports/2014/Management_Challenges-2014.pdf</p>	<p>To determine the effectiveness of EPA’s framework for assessing and managing chemical risks under the Food Quality Protection Act (FQPA) and the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA).</p>	<p>Limited authorities, limited data on health effects and resource constraints inhibit EPA’s effective implementation of the Toxic Substances Control Act, the FQPA and the FIFRA, meant to ensure that the production and distribution of chemicals do not harm human health or the environment.</p>	<p>OIG recommends that EPA establish and track program performance measures so that it can demonstrate progress on obtaining and analyzing targeted data on chemical exposure, risk, and health effects.</p> <p>EPA Response: The Endocrine Disruptor Screening Program is having some success in prioritizing chemicals for their health effects, and in identifying chemicals for further screening and testing. Computational toxicity tools (CompTox), such as the in-vitro high-throughput screening assays, are used to rapidly identify potential bioactivity. High-throughput exposure models estimate environmentally relevant doses of</p>

				thousands of chemicals. This new approach could save the American public millions of dollars and create efficiency in EPA's chemical testing program to ensure human and environmental health protection.
4	<p><i>Impact of EPA's Conventional Reduced Risk Pesticide Program Is Declining</i></p> <p>OIG</p> <p>Report No. 14-P-0322, July 24, 2014, http://www.epa.gov/oig/reports/2014/20140724-14-P-0322.pdf</p>	To determine the impact of the Pesticide Registration Improvement Act (PRIA) on the number of registered reduced risk pesticides.	The impact of the Conventional Reduced Risk Pesticide (CRRP) program has declined over the last 10 years, with fewer reduced risk pesticides registered than before the 2004 implementation of the PRIA. OIG believes the PRIA is a factor in the CCRP's program declining impact, because of the increased cost to register reduced risk pesticides and the decreased time-to-market savings that reduced risk pesticides had over conventional pesticides before the PRIA.	OIG recommended that the Assistant Administrator for Chemical Safety and Pollution Prevention seek authority from Congress to reduce PRIA application fees for reduced risk pesticides to increase participation in the program and to develop program performance measures to fully capture the impact of the entire CRRP program.
4	<p><i>EPA's Risk Assessment Division Has Not Fully Adhered to Its Quality Management Plan</i></p> <p>OIG</p> <p>Report No. 14-P-0350, September 10, 2014, http://www.epa.gov/oig/</p>	To determine to what extent the Office of Pollution Prevention and Toxics' (OPPT's) Risk Assessment Division (RAD) uses and implements quality management policies during chemical risk	The lack of adherence to several aspects of RAD's Quality Management Plan (QMP) creates the risk that RAD's quality system cannot meet the EPA quality management system's goal. RAD needs to implement quality assurance training and conduct training needs	OIG recommended that the program: <ul style="list-style-type: none"> • Develop formal quality assurance training to promote awareness of quality management policies and compliance with the QMP. • Conduct annual internal quality assurance audits in accordance with its QMP. • Identify and document individual

	reports/2014/20140910-14-P-0350.pdf	assessments.	assessments to ensure that managers and staff obtain relevant quality assurance knowledge. RAD's Quality Assurance Coordinator needs to conduct annual independent reviews of the division's quality assurance processes to assure the quality of work.	staff training needs. <ul style="list-style-type: none"> • Ensure that RAD's QMP and/or the OPPT annual quality assurance report and work plan are updated when changes are made to RAD's quality assurance activities. • Provide internal online access to RAD's QMP. • Conduct quality assurance analysis of OPPT to determine whether all divisions have fully implemented their QMPs. <p>EPA Response: Please see OIG final report No. 14-P-0350, September 10, 2014, Attachment A (Corrective Action Plan).</p>
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