



# At a Glance

## Why We Did This Review

The U.S. Environmental Protection Agency (EPA), Office of Inspector General (OIG), conducted an audit of Cooperative Agreement (CA) No. 83388101 awarded to the Association of Schools of Public Health (ASPH). The EPA's Office of Research and Development awarded the CA to ASPH on July 29, 2008. The purpose of the CA was to place recent graduates into 1- or 2-year fellowships at the EPA, during which the fellows would be mentored by EPA experts.

We sought to determine whether the federal funds were used for their intended purpose and in accordance with the CA terms and conditions and applicable government regulations. In addition, we sought to determine whether the CA's objectives were met.

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

- *Working toward a sustainable future.*

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The full report is at:  
[www.epa.gov/oig/reports/2014/20140917-14-P-0357.pdf](http://www.epa.gov/oig/reports/2014/20140917-14-P-0357.pdf)

## ***Recipient Subawards to Fellows Did Not Comply With Federal Requirements and EPA's Involvement in Fellow Selection Process Creates the Appearance EPA Could Be Circumventing the Hiring Process***

### What We Found

Our audit did not disclose anything that would indicate that ASPH improperly used federal funds or that the objectives of the CA were not met. However, we did identify two areas under the CA that require improvement by the EPA.

ASPH's subawards to fellows made under the CA are contrary to federal requirements. Per the agreement between ASPH and the fellows, ASPH considers the fellows as subgrantees, but individuals are ineligible as subgrantees under the Code of Federal Regulations. As a result, a different award vehicle is needed for the ASPH fellowship program.

Also, the EPA's involvement in the selection process for fellowship candidates creates the appearance that the agency could be circumventing the hiring process and recruiting fellows in place of permanent employees. EPA Order 5700.1 states that substantial involvement is anticipated where a project is expected to entail agency involvement in the selection of key recipient personnel.

**ASPH's subawards to fellows made under the CA are contrary to federal requirements because individuals are ineligible as subgrantees and agency involvement in selection of fellows creates an appearance that the EPA could be circumventing the hiring process.**

### Recommendations and Planned Corrective Actions

We recommend that the Director of the EPA Office of Grants and Debarment determine the proper vehicle to be used under the CA and take the necessary actions to ensure subawards comply with applicable federal regulations. We also recommend that the Director obtain an Office of General Counsel opinion on how the EPA should be involved in the selection of fellows and, as needed, reduce the appearance that the fellowship program is circumventing the hiring and recruiting process.

The agency agreed with our recommendations and provided corrective actions with estimated completion dates.