



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

APR -7 2011

MEMORANDUM

THE INSPECTOR GENERAL

SUBJECT: OIG Response to the 90 Day Comments on Final Report Number
10-P-0177, *EPA's Revised Hiring Process Needs Additional Improvements*

TO: Craig E. Hooks
Assistant Administrator for Administration and Resources Management

Barbara Bennett
Chief Financial Officer

Malcolm D. Jackson
Assistant Administrator for Environmental Information

The corrective actions planned for the recommendations with which you concurred in your letter of December 20, 2010, are acceptable. Although some of the actions will not be completed immediately, they should eventually improve the efficiency and effectiveness with which the EPA hires staff members.


Regarding the two recommendations addressed to the Assistant Administrator for Administration and Resources Management with which you disagreed, I believe one is resolved. In recommendation 3-4(c)(1), we recommended that the Assistant Administrator establish standard operating procedures to address how recruitment actions are assigned to specialists. It was intended to correct problems identified at the Las Vegas Human Resources Management Division (HRMD). According to information the Director of the Office of Human Resources provided to my office on March 17, 2011, the Office of Administration and Resources Management intends to address the matter in a different way. Specifically, by April 2011 the Las Vegas HRMD will become part of the Cincinnati HRMD. Since the Cincinnati HRMD assigns specialists by organization serviced, this corrective action is acceptable.

We continue to disagree on recommendation 2-3, that the Assistant Administrator change EPA Order 1110.8A5, *EPA Reorganization Policy*, and the related toolkit to require that infrastructure requirements (including information systems) are considered and addressed, and risks are assessed in accordance with OMB Circular A-123 before implementing reorganizations. The proposed review of the reorganization Order with a view toward making changes as needed is insufficient. We believe that planned reorganizations should specifically address the risks posed by not having expected elements in place. In this case, the staffing levels proposed for the service centers were neither adequately supported nor adjusted to reflect actual conditions. EPA offices questioned the adequacy of staffing levels before the reorganization plan was approved. The decision was that the proposed staffing levels would be sufficient because the service centers

planned to have an electronic processing and tracking system. However, EPA transitioned to the service centers before implementing the necessary information technology improvements. Requiring identification of the risks in the reorganization plan would have allowed management to make more informed decisions about the reorganization.

Please consider our comments regarding Recommendation 2-3 to see if we can find a way to resolve this issue. As a reminder, we expect you to notify us of any changes to the corrective actions plan or when you inactivate the assignment in MATS.

If you or your staff have any questions regarding this memo, please contact Wade Najjum, Assistant Inspector General for Program Evaluation at (202) 566-0827 or Eric Lewis at (202) 566-2664.



Arthur A. Elkins, Jr.

Attachment: 90 Day Comments

cc: Director, Office of Human Resources
Audit Liaison, Office of Administration and Resources Management
Audit Liaison, Office of Chief Financial Officer
Audit Liaison, Office of Environmental Information