



# At a Glance

## Why We Did This Review

Based on a request from the U.S. Environmental Protection Agency (EPA) Assistant Administrator for the Office of Research and Development (ORD), we examined EPA's review process for Science to Achieve Results (STAR) grant Request for Applications (RFA) EPA-G2009-STAR-F1, "Advancing Public Health Protection through Water Infrastructure Sustainability." We sought to determine whether EPA followed applicable policies and procedures, and communicated with applicants appropriately. ORD's National Center for Environmental Research's (NCER's) STAR grant program funds research through a competitive solicitation process and independent peer review. For the RFA reviewed, NCER conducted two peer reviews. NCER voided results of a December 2009 peer review panel due to concerns over expertise and innovativeness, and completed a second peer review in June 2010.

## This report addresses the following EPA Goal or Cross-Cutting Strategy:

- *Advancing science, research, and technological innovation*

For further information, contact our Office of Congressional and Public Affairs at (202) 566-2391.

The full report is at:  
[www.epa.gov/oig/reports/2012/20120925-12-P-0864.pdf](http://www.epa.gov/oig/reports/2012/20120925-12-P-0864.pdf)

## ***EPA's Review of Applications for a Water Research Grant Did Not Follow All Review Procedures and Lacked Transparency***

### What We Found

NCER did not follow all applicable policies and procedures in reviewing applications submitted under RFA EPA-G2009-STAR-F1, and lacked procedures for a key aspect of its STAR grant application peer review process. Specifically:

- NCER did not follow the review process required by the Code of Federal Regulations (C.F.R) under 40 C.F.R Part 40.150. EPA subsequently issued a class exception from 40 C.F.R 40.150 that retroactively applied to the process for this and other RFAs, but NCER did not make this known to the public.
- For more than half of the 72 applications reviewed during each peer review, at least one of the three assigned peer reviewers did not provide written comments addressing each evaluation criterion as required.
- NCER did not have a clearly defined "firewall" policy for its peer review process. The process used to select reviewers for the June 2010 review, in our view, was inconsistent with descriptions of NCER's firewall practice published in 2002 and 2003 National Academies reports.

NCER did not communicate with all applicants for the RFA in a transparent, appropriate, accurate, and timely manner. For example, NCER was not transparent in communicating its decision to conduct a second review, the expected delays resulting from the second review, and whether the results sent to applicants were based on the December 2009 or June 2010 review. NCER's declination letters did not sufficiently explain why applicants were not selected or inform them of the option to request a debriefing. NCER informally communicated results to some applicants prior to final selection decisions.

The issues noted stemmed from a lack of program procedures and management controls, resulting in delays and additional costs for NCER to review applications for the RFA. In addition, the control weaknesses identified could also harm the reputation of EPA's STAR program that has been characterized in the past as a program with an independent, rigorous process that funds high-quality research.

### Recommendations and Planned Agency Corrective Actions

We recommend that the Assistant Administrator for Research and Development ensure that NCER makes the public aware of its class exception from 40 C.F.R 40.150, establishes and adheres to improved procedures and management controls for administering the STAR grant program, and improves its guidance and management controls for communicating with grant applicants. The Agency agreed with our conclusions and agreed with the intent of our recommendations. Planned corrective actions will be addressed in the Agency's 90-day response.