



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

OFFICE OF  
INSPECTOR GENERAL

October 31, 2019

**MEMORANDUM**

**SUBJECT:** Notification of Evaluation:  
Effectiveness of EPA's External Civil Rights Compliance Office in Determining  
Title VI Compliance in Organizations Receiving EPA Clean Air Act Funding  
Project No. OA&E-FY19-0357

**FROM:** James L. Hatfield, Director, Air Directorate  
Office of Audit and Evaluation

A handwritten signature in cursive script, appearing to read "James L. Hatfield", is written in brown ink.

**TO:** Matthew Z. Leopold, General Counsel  
Office of General Counsel

The Office of Inspector General (OIG) for the U.S. Environmental Protection Agency (EPA) plans to begin an evaluation of the EPA's implementation of Title VI, which prohibits recipients of federal financial assistance from discriminating on the basis of race, color, or national origin when implementing programs and activities. This evaluation was included in our fiscal year 2019 Annual Plan and is a discretionary, self-initiated assignment.

The OIG's objective is to determine whether the External Civil Rights Compliance Office (ECRCO) has implemented an oversight system to provide reasonable assurance that organizations receiving EPA Clean Air Act (CAA) funds comply with Title VI requirements. The OIG plans to conduct work at EPA headquarters and possibly a few EPA regions, if necessary. The evaluation will be conducted using *Quality Standards for Inspection and Evaluation*, issued by the Council of the Inspectors General on Integrity and Efficiency. The anticipated benefits of this evaluation are to improve operational efficiency and effectiveness within ECRCO's compliance and enforcement program and to help identify potential discriminatory conduct on the part of recipient agencies, especially in overburdened communities.

We will contact you to arrange a mutually agreeable time to discuss our objectives. We would also be particularly interested in any areas of concern that you may have. We will answer any of your questions about the evaluation process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the evaluation. Throughout the evaluation, we will provide updates on a regular basis.

To expedite our evaluation, please be ready to provide the following information at the entrance conference:

- Copies of any internal ECRCO guidance related to compliance assurance.
- Access to databases used by ECRCO to track Title VI complaints.

We respectfully note that the OIG is authorized by the Inspector General Act of 1978, as amended, to have timely access to personnel and all materials necessary to complete its objectives. We will request that you resolve the situation if an agency employee or contractor refuses to provide requested records to the OIG or otherwise fails to cooperate with the OIG. We may report unresolved access matters to the Administrator and include the incident in the *Semiannual Report to Congress*.

I will supervise the project, and the Project Manager will be Gabby Fekete. Any information related to the project should be addressed to me at (919) 541-1030 or [hatfield.jim@epa.gov](mailto:hatfield.jim@epa.gov), or Gabby Fekete at (919) 541-3537 or [fekete.gabrielle@epa.gov](mailto:fekete.gabrielle@epa.gov).

cc: Henry Darwin, Assistant Deputy Administrator  
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