

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

OFFICE OF INSPECTOR GENERAL

January 8, 2020

## **MEMORANDUM**

**SUBJECT:** Notification of Audit:

Evaluating EPA's Response to Findings from Audits and Inspections Related to Its

National Enforcement Investigations Center

Project No. OA&E-FY20-0099

**FROM:** Patrick Gilbride, Director /s/

Environmental Research Directorate Office of Audit and Evaluation

**TO:** Susan Parker Bodine, Assistant Administrator

Office of Enforcement and Compliance Assurance

The Office of Inspector General (OIG) for the U.S. Environmental Protection Agency (EPA) plans to conduct an audit of the EPA's Office of Enforcement and Compliance Assurance (OECA)—specifically, the Office of Criminal Enforcement, Forensics and Training (OCEFT) and OCEFT's National Enforcement Investigations Center (NEIC)—corrective actions in response to internal and external audits, inspections, and documented concerns. This audit is the result of a hotline complaint and other similar complaints received by the OIG.

The OIG's objective is to determine whether OCEFT and the NEIC are addressing findings and implementing corrective actions from audits, inspections, and documented concerns related to the NEIC. The OIG plans to conduct work at the NEIC and coordinate with OECA and OCEFT as necessary. Applicable generally accepted government auditing standards will be used in conducting our audit. The anticipated benefit of this audit is improved operational efficiency.

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

To expedite our audit, please provide us with the following information for fiscal years 2014–2019 at or before our entrance conference (links to web addresses, if available, are acceptable):

1. All Professional Integrity and Quality Assurance (PIQA) audit, inspection and quality assurance (QA) reports related to the NEIC, as well as manuals and plans associated with these reports.

- 2. All reports on the NEIC—such as audit, inspection and QA reports—that are internal to OCEFT and the NEIC, as well as manuals and plans associated with these reports.
- 3. Documented communication of NEIC-related concerns or findings from PIQA or NEIC QA Managers to their management, such as reports, meeting minutes and notes, and/or emails.
- 4. Documented concerns and nonconformities communicated to PIQA or NEIC QA Managers about NEIC operations.
- 5. All audit reports on the NEIC or OCEFT—such as reports for laboratory accreditation by third parties or Quality System Assessments by the Office of Mission Support—that are external to OCEFT.
- 6. The NEIC's audit/inspection finding resolution or corrective action request tracking mechanism(s)—such as files, spreadsheets and databases—including:
  - a. Corrective action requests that originate from complaints, internal and external audits, management reviews, etc.
  - b. NEIC responses to complaints and nonconformities, as well as any plans to implement corrective actions.
  - c. Any NEIC-related findings, corrective action requests, nonconformities, recommendations or corrective actions not contained in formal reports.
- 7. PIQA audit/inspection finding resolution or corrective action request tracking mechanism(s)—such as files, spreadsheets and databases—including:
  - a. Corrective action requests that originate from complaints, internal and external audits, management reviews, etc.
  - b. NEIC responses to complaints and nonconformities, as well as any plans to implement corrective actions.
  - c. Any NEIC-related findings, corrective action requests, nonconformities, recommendations or corrective actions not contained in formal reports.
- 8. All PIQA and NEIC policies, procedures or guidance documents on conducting and/or resolving audits, inspections and reviews that lead to findings, recommendations or corrective actions.
- 9. Annual Management Review Reports, such as meeting documentation and spreadsheets.
- 10. OCEFT and NEIC Quality Management Plans.
- 11. OCEFT Immediate Office, PIQA and NEIC staff rosters, with staff highlighted who are directly involved in audits, inspections, QA reviews and associated follow-ups.

After reviewing these initial materials, the OIG may request additional documentation regarding specific corrective actions and implementation.

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 audit and the Project Manager will be Jim Kohler. Any questions about the document request or information related to the project should be addressed to me at (303) 312-6969 or <a href="mailto:gilbride.patrick@epa.gov">gilbride.patrick@epa.gov</a>, or Jim Kohler at (202) 566-1032 or <a href="mailto:kohler.james@epa.gov">kohler.james@epa.gov</a>.

cc: Henry Darwin, Assistant Deputy Administrator

Doug Benevento, Associate Deputy Administrator

Ryan Jackson, Chief of Staff

Michael Molina, Deputy Chief of Staff

Kevin DeBell, Acting Deputy Chief of Staff

Lawrence Starfield, Principal Deputy Assistant Administrator for Enforcement and Compliance Assurance

John Irving, Deputy Assistant Administrator for Enforcement and Compliance Assurance Henry Barnet, Director, Office of Criminal Enforcement, Forensics and Training, Office of Enforcement and Compliance Assurance

Erica Canzler, Director, Office of Criminal Enforcement, Forensics and Training, Office of Enforcement and Compliance Assurance, National Enforcement Investigation Center

Gwendolyn Spriggs, Audit Follow-Up Coordinator, Office of Enforcement and Compliance Assurance

Annette Morant, Agency Follow-Up Coordinator

Corry Schiermeyer, Associate Administrator for Public Affairs

Regional Audit Follow-Up Coordinators, Regions 1–10

Charles J. Sheehan, Acting Inspector General

Edward Shields, Acting Deputy Inspector General

Eric Hanger, Deputy Counsel to the Inspector General

Kevin Christensen, Assistant Inspector General for Audit and Evaluation

Helina Wong, Assistant Inspector General for Investigations

Stephanie Wright, Acting Assistant Inspector General for Management

Richard Eyermann, Deputy Assistant Inspector General for Audit and Evaluation

Christine El-Zoghbi, Deputy Assistant Inspector General for Audit and Evaluation

Rashmi Bartlett, Deputy Assistant Inspector General for Audit and Evaluation

Jennifer Kaplan, Deputy Assistant Inspector General for Congressional and Public Affairs

Jeffrey Lagda, Congressional and Media Liaison, Office of Inspector General

Tia Elbaum, Congressional and Media Liaison, Office of Inspector General