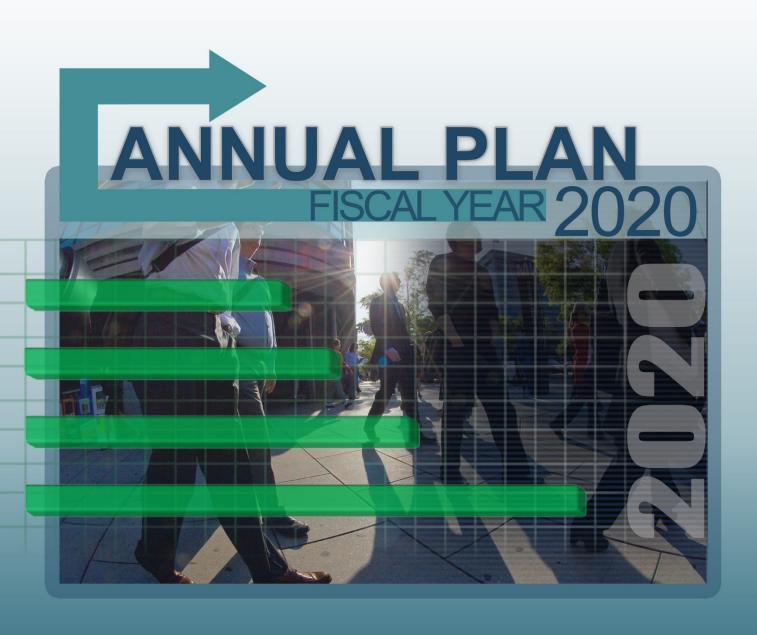


OFFICE OF INSPECTOR GENERAL



This plan is available at www.epa.gov/oig.

Definitions

Carryover Assignments started in a prior fiscal year that are still in progress.

Discretionary Assignments not required by law or regulation but address areas of high risk.

Mandated Assignments that the Office of Inspector General is required to conduct by law or

regulation.

Abbreviations

CIGIE Council of the Inspectors General on Integrity and Efficiency

CSB U.S. Chemical Safety and Hazard Investigation Board

EPA U.S. Environmental Protection Agency

FIFRA Federal Insecticide, Fungicide, and Rodenticide Act FISMA Federal Information Security Modernization Act

FY Fiscal Year

GAO U.S. Government Accountability Office

IT Information Technology

OA&E Office of Audit and Evaluation

OC Office of Counsel

OCCPA Office of Counsel and Congressional and Public Affairs

OCPA Office of Congressional and Public Affairs

OI Office of Investigations
OIG Office of Inspector General
OM Office of Management

PRIA Pesticide Registration Improvement Act of 2003

U.S.C. United States Code

Are you aware of fraud, waste, or abuse in an EPA or CSB program?

EPA Inspector General Hotline

1200 Pennsylvania Avenue, NW (2431T) Washington, D.C. 20460 (888) 546-8740

(202) 566-2599 (fax) OIG Hotline@epa.gov

Learn more about our OIG Hotline.

EPA Office of Inspector General

1200 Pennsylvania Avenue, NW (2410T) Washington, D.C. 20460 (202) 566-2391

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Message from the Inspector General

I am pleased to present the U.S. Environmental Protection Agency's Office of Inspector General Annual Plan for fiscal year 2020. This plan describes how the OIG will promote economy, efficiency, and effectiveness in the programs and operations of the EPA and the U.S. Chemical Safety and Hazard Investigation Board. It also describes how the OIG prevents and detects waste, fraud, and abuse in those programs and operations. Further, the Annual Plan shows how the OIG will continue to promote the goals and objectives of OIG's Strategic Plan.



The Annual Plan identifies mandated and discretionary assignment topics continuing from FY 2019, as well as mandated and discretionary assignments scheduled to start

during FY 2020. The OIG often performs unanticipated work based on legislative mandates, congressional inquiries, or hotline requests. It is important that we remain flexible to address these and other priorities as they arise. Readers are encouraged to visit our <u>website</u> periodically to view reports about projects that are discussed in our Annual Plan.

As set forth in this plan, our Office of Audit and Evaluation seeks to support the EPA's mission of protecting human health and the environment through audits and evaluations performed in accordance with applicable professional standards. For example, in 2018, the EPA Administrator identified risk communication as a top priority of the Agency. In 2020, our auditors will continue to evaluate the EPA's communication of risk to human health, and, where appropriate, identify areas for improvement. We will also examine other programs and functions that the OIG has identified as key management challenges for the Agency, such as oversight of states and tribes, enhancing information security to combat cyber threats, improving data quality, and filling data gaps.

Our Office of Investigations also seeks to further the OIG's mission by investigating allegations of criminal activity and serious misconduct involving EPA and CSB programs and operations. For example, every year the EPA awards a significant portion of its budget in grants and other assistance to further the protection of human health and the environment. Our investigators will continue to investigate allegations of fraud and other crimes involving money or property that is to be spent to advance EPA interests and programs.

The success of our Annual Plan also lies in the efficiency and effectiveness promoted by our leadership and support offices, which work to ensure our core mission offices function at optimum levels in support of the OIG mission. The Office of Management helps the OIG effectively and efficiently achieve its mission by, among other things, developing programs to attract and retain high-talent staff. The Office of Congressional and Public Affairs supports the OIG mission by innovatively communicating the OIG's work to Congress and the public. And the Office of Counsel supports the OIG by providing independent legal and policy advice to all OIG components, covering a variety of substantive and procedural matters relating to the OIG's audits, evaluations, investigations, and other activities.

The Annual Plan reflects the priority work that the OIG believes is necessary to keep the EPA, the CSB, and Congress fully informed about problems and deficiencies relating to the administration of Agency programs and operations. We look forward to meeting our goals and fulfilling our mission. For those interested in our planning process, we welcome feedback on the quality and value of our products and services via OIG WEBCOMMENTS@epa.gov.

Sean W. O'Donnell Inspector General

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About the U.S. Environmental Protection Agency Office of Inspector General

EPA OIG

The OIG is an independent office within the EPA that detects and prevents fraud, waste, and abuse, and promotes economy and efficiency to help the Agency protect human health and the environment more efficiently and cost effectively. The EPA Inspector General was also designated by Congress in fiscal year 2004 to serve as the Inspector General for the U.S. Chemical Safety and Hazard Investigation Board.

The OIG was established under the Inspector General Act of 1978, as amended (5 U.S.C. app.). The Act required the establishment of Inspectors General as independent and objective units for the following purposes:

- 1. Conduct and supervise audits and investigations relating to the programs and operations of their agencies.
- 2. Provide leadership and coordination, and recommend policies for activities designed to promote economy, efficiency, and effectiveness, and to prevent and detect fraud, waste, and abuse.
- 3. Provide a means for keeping the head of the Agency and Congress fully and currently informed about problems and deficiencies, as well as the necessity and progress of corrective actions.

The OIG conducts independent audits, evaluations, and investigations; makes evidence-based recommendations to promote economy, efficiency, and effectiveness; and prevents and detects fraud, waste, abuse, mismanagement, and misconduct for the EPA and the CSB. The OIG Hotline provides a channel for anyone, including EPA and CSB employees, participants in EPA and CSB programs, Congress, organizations, and members of the public, to report instances of fraud, waste, and abuse, and submit requests pertaining to Agency programs. Each year, the OIG receives hundreds of complaints, referrals, suggestions, and allegations. The OIG promptly processes this information and, when warranted, initiates OIG investigations, refers issues for audits or evaluations, or refers issues to the appropriate EPA office or other agency if not within EPA's jurisdiction. The OIG often uses data analysis methodologies to analyze hotline matters. This analysis assists the OIG in identifying trends that are reported to the hotline to improve the overall efficiency and effectiveness of our investigations and audits.

We discuss issues with the EPA, the CSB, and others, including Congress members, and provide detailed reports. We publish a Semiannual Report to Congress that identifies significant EPA and CSB deficiencies and proposed corrective actions, as well as profiles our accomplishments.

The OIG staff are located at headquarters in Washington, D.C.; all ten EPA regional offices; and at Research Triangle Park in North Carolina, and Cincinnati, Ohio.

The Plan: OlG's Overall Strategy

Annual planning is a dynamic process and requires adjustments throughout the year to meet priorities and anticipate and respond to emerging issues with available resources. The OIG has examined the cross-agency risk assessments, Agency challenges, the EPA 2018–2022 Strategic Plan, the CSB 2017–2021 Strategic Plan, the OIG 2019–2023 Strategic Plan, prior work, future priorities, and stakeholder input to develop and prioritize its FY 2020 work.

Goal Oriented, Mission Focused

The OIG is dedicated to fulfilling its mission as established in the Inspector General Act with excellence and the highest level of commitment to service. In doing so, we will exemplify our core values of customer service, integrity, and accountability. For FY 2020, we will execute the following priorities:

- 1. Work toward developing a robust enterprise risk management program.
- 2. Aggressively pursue high-risk/high-vulnerability programs for audits, evaluations, and investigations.
- 3. Meet or exceed established performance targets.
- 4. Execute a clear messaging strategy geared toward increased visibility in support of ensuring the free-flow of information from the public that would assist in rooting out fraud, waste, and abuse in environmental and health and human services programs and associated initiatives.
- 5. Continue to be responsive to congressional inquiries and actively assess and address hotline complaints.
- 6. Maintain a well-trained, well-equipped workforce of professionals and give them the opportunity to excel in their fields.
- 7. Increase collaborations with the Council of Inspectors General on Integrity and Efficiency and sister organizations within the Inspector General community in order to leverage learned best practices that will increase our effectiveness and efficiency.

Each office within the OIG will prioritize work in accordance with the above organizational priorities and will adhere to its respective internal priorities. Our organization expects that objectives will be met with excellence, professionalism, accuracy, and the highest regard for our greatest asset—our workforce.

The OIG's Strategic and Annual Plans align with the Inspector General Act and the EPA's and CSB's strategic goals, and help these agencies achieve their performance goals in the most economical, efficient, and effective manner. The list below identifies the EPA's FY 2018–2022 strategic goals, followed by the CSB's mission and goals, which we consider when planning audits, evaluations, and investigations. Within this document, we provide more details about the

OIG's FY 2020 annual performance measures and targets. Appendix A provides a summary of the OIG's Strategic Plan 2019–2023.

EPA's Mission

The EPA's mission is to protect human health and the environment by ensuring that:

- Americans have clean air, land, and water.
- National efforts to reduce environmental risks are based on the best available science.
- Federal laws protecting human health and the environment are administered and enforced fairly, effectively, and as intended.
- Environmental stewardship is integral to U.S. policies concerning natural resources, human health, economic growth, energy, transportation, agriculture, industry, and international trade, and these factors are similarly considered in establishing environmental policy.
- All parts of society communities, individuals, businesses, and state, local, and tribal governments have access to accurate information to effectively participate in managing human health and environmental risks.
- Contaminated lands and toxic sites are cleaned up by potentially responsible parties and revitalized.
- Chemicals in the marketplace are reviewed for safety.

EPA's FY 2018–2022 Strategic Goals

Strategic Goals

Goal 1: A Cleaner, Healthier Environment: Deliver a cleaner, safer, and healthier environment for all Americans and future generations by carrying out the Agency's core mission.

- Objective 1.1 Improve Air Quality: Work with states and tribes to accurately measure air quality and ensure that more Americans are living and working in areas that meet high air quality standards.
- Objective 1.2 Provide for Clean and Safe Water: Ensure waters are clean through improved water infrastructure and, in partnership with states and tribes, sustainably manage programs to support drinking water, aquatic ecosystems, and recreational, economic, and subsistence activities.
- Objective 1.3 Revitalize Land and Prevent Contamination: Provide better leadership and management to
 properly clean up contaminated sites to revitalize and return the land back to communities.
- Objective 1.4 Ensure Safety of Chemicals in the Marketplace: Effectively implement the Toxics Substances Control Act, and the Federal Insecticide, Fungicide, and Rodenticide Act, to ensure new and existing chemicals and pesticides are reviewed for their potential risks to human health and the environment, and actions are taken when necessary.

Goal 2: More Effective Partnerships: Provide certainty to states, localities, tribal nations, and the regulated community in carrying out shared responsibilities and communicating results to all Americans.

- Objective 2.1 Enhance Shared Accountability: Improve environmental protection through shared governance and enhanced collaboration with state, tribal, local, and federal partners using the full range of compliance assurance tools.
- Objective 2.2 Increase Transparency and Public Participation: Listen to and collaborate with impacted stakeholders and provide effective platforms for public participation and meaningful engagement.

Goal 3: Greater Certainty, Compliance, and Effectiveness: Increase certainty, compliance, and effectiveness by applying the rule of law to achieve more efficient and effective Agency operations, service delivery, and regulatory relief.

- Objective 3.1 Compliance with the Law: Timely enforce environmental laws to increase compliance rates and promote cleanup of contaminated sites through the use of all of EPA's compliance assurance tools, especially enforcement actions to address environmental violations.
- Objective 3.2 Create Consistency and Certainty: Outline exactly what is expected of the regulated community to ensure good stewardship and positive environmental outcomes.
- Objective 3.3 Prioritize Robust Science: Refocus the EPA's robust research and scientific analysis to inform policy making.
- Objective 3.4 Streamline and Modernize: Issue permits more quickly and modernize our permitting and reporting systems.
- Objective 3.5 Improve Efficiency and Effectiveness: Provide proper leadership and internal operations management to ensure that the Agency is fulfilling its mission.

CSB's Mission

The CSB's mission is to drive chemical safety change through independent investigations to protect people and the environment. The CSB investigates industrial chemical accidents at facilities, reports on the root causes to the public, and recommends measures to prevent future occurrences. The OIG has the responsibility to audit and investigate CSB programs and



review proposed laws and regulations to determine their potential impact on CSB programs and operations.

The following are the CSB's strategic goals:

- Prevent recurrence of significant chemical incidents through independent investigations.
- Advocate safety and achieve change through recommendations, outreach and education.
- Create and maintain an engaged, high-performing workforce.

The Plan: Office of Audit and Evaluation Carryover and New Assignments for FY 2020

The OIG's OA&E:

- Plans and conducts complex audits and evaluations, including follow-ups on EPA programs, systems, and operations.
- Serves as the OIG's national technical expert for assigned areas of responsibility, advising OIG personnel and others on program operations and audit and evaluation approaches.
- Works with senior officials from the EPA; the Office of Management and Budget; other federal, state and local government offices; and professional and environmental organizations to improve coordination, customer service, and results.
- Prepares reports and delivers presentations on audit and evaluation methods, findings, and recommendations.
- Conducts research on, and stays attuned to, methods and best practices within the OIG community to use in our audits and evaluations.

The ten directorates within the OA&E are responsible for auditing and evaluating EPA and CSB programs and recommending improvements to programs and operations. The directorates are:

- Air.
- Contract and Assistance Agreement.
- Efficiency.
- Environmental Research Programs.
- Financial.
- Forensic.
- Information Resources Management.
- Land Cleanup and Waste Management.
- Toxics, Chemical Management and Pollution Prevention.
- Water.

Projects are also undertaken by the Immediate Office within the OA&E.

Point of Contact: Christine El-Zoghbi, Acting Assistant Inspector General for Audit and Evaluation, (202) 566-2063.

In FY 2020, the OA&E will focus its efforts on ensuring the timely completion of mandatory projects as well as identifying discretionary projects. The OA&E's work priorities support efforts toward successfully fulfilling the following overall strategic measures (see full list of OIG Strategic Measures at Appendix B):

Strategic Measure	
#	Strategic Measure Description
1.1.1	By September 30, 2023, the OIG will have conducted audits and evaluations resulting in recommendations in specific areas geared toward improved EPA policies, procedures, and practices contributing to improved human health, safety, or environmental quality in each of its major offices and sub-offices. Further, the OIG will continue to work with the Agency to track implementation of OIG recommendations.
1.2.1	By September 30, 2023, the OIG will be able to show quantitative measures supporting the OIG's contribution to the reduction or elimination of environmental risks and challenges by conducting audits, evaluations, or investigations. We will conduct at least one audit, evaluation, or investigation addressing an emerging environmental risk or challenge.
1.2.2	By September 30, 2023, the OIG will have contributed to the reduction and elimination of environmental risks and challenges by conducting at least one audit or evaluation in each of the EPA's six priority goal areas rendering impactful recommendations.
2.2.1	By September 30, 2023, the OIG will perform audits and evaluations in each EPA priority area, resulting in documented, data-supported improvements in efficiency and accountability across the Agency.
2.3.1	By September 30, 2023, the OIG will have reduced risk of loss by detecting monetary benefits through audits and evaluations targeting initiatives within the EPA's six priority goals.
2.4.2	By September 30, 2023, the OIG will have increased the effectiveness of audits and evaluations using quantifiable impact in implemented recommendations as our measure.
2.4.3	By September 30, 2023, the OIG will increase its return on investment to a minimum ratio of 12 to 1 as an average from 2019 to 2023.
3.2.3	By September 30, 2023, the OIG will identify high-risk and high-vulnerability OIG activities, implement appropriate review for activities that are considered high risk, and minimize them to an appropriate degree. The OIG will implement at least one mitigation plan.
3.3.2	By September 30, 2023, the OIG's Federal Employee Viewpoint Survey scores in at least three of the five Office of Personnel Management embedded indexes (Employee Engagement, Global Satisfaction, Effective Communications, New Inclusion Quotient, and Human Capital Assessment and Accountability Framework) and will increase by at least 10 percent from each index's 2018 average.
3.3.3	By September 30, 2023, due to various programs that we put into place, the OIG will work to increase its "Best Places to Work" score for an Agency subcomponent (as administered by the Partnership for Public Service) by at least one quartile from FY 2018 levels.

OA&E work that is not mandated by Congress is proposed, considered, and selected through a rigorous process using the criteria listed in the section below. From these criteria, we develop a

portfolio of assignments that represents the best return on investment in terms of monetary or public value, and responsiveness in addressing the needs, risks, challenges, priorities, and opportunities of OIG stakeholders. We also invite our staff to formulate assignment suggestions from their immediate knowledge of EPA and CSB operations and from their consideration of stakeholder input and risks.

In FY 2019, the EPA OIG initiated a pilot effort to implement evaluations of Agency programs and operations in compliance with the CIGIE *Quality Standards for Inspection and Evaluation*, also known as the "Blue Book." These evaluations will be performed in addition to audits that comply with the U.S. Government Accountability Office's generally accepted government auditing standards, also known as "GAGAS." Section 11(c)(2) of the Inspector General Act provides that members of CIGIE shall "adhere to professional standards developed by the Council" to the extent that they are not inconsistent with standards established by the Comptroller General of the United States for audits of federal establishments (5 U.S.C. app.). In June 2010, CIGIE officially adopted the Blue Book as the professional standard for all inspection and evaluation work performed by member organizations.

The Blue Book defines inspections or evaluations as "systematic and independent assessments of the design, implementation and/or results of an Agency's operations, programs or policies." Evaluations provide information that is timely, credible, and useful for Agency managers, policymakers, and other stakeholders. Evaluations can be used to determine the efficiency, effectiveness, impact, and sustainability of Agency operations, programs, and policies. Evaluations often recommend improvements and identify where administrative action is necessary. The Blue Book identifies other uses of evaluations, including, but not limited to:

- Providing factual and analytical information.
- Measuring performance.
- Determining compliance with applicable laws, regulations, and policies.
- Identifying savings and funds to be put to better use.
- Sharing best practices.
- Assessing allegations of fraud, waste, abuse, and mismanagement.

Criteria Considered in Identifying and Selecting New Discretionary Assignments for FY 2020

Potential threats to OIG independence:

- Are there any potential threats to OIG independence if we perform this project?
- Will the OIG be able to comply with professional standards, legal requirements, and ethical principles?

Significance of proposed project:

• What is the known extent of the issue (e.g., sensitive or other populations impacted, area involved, and environmental justice)?

- Is the topic of the project generating interest from Congress, the public, or news organizations? Why?
- What is the potential environmental or human health benefit (return on investment) to be derived, and how extensive is the potential for reduction or prevention of environmental, human health, or business risks?
- What is the expected return on investment (e.g., potential questioned costs, funds put to better use, or other potential monetary benefits, improved decision-making, improved data quality and reliability, reduced vulnerabilities, and strengthened internal control)?
- Are programs performing with the greatest efficiency and effectiveness regarding allocation and application of resources?
- What resources, data, physical or cybersecurity equipment, program integrity, and potential violations of laws/regulations are involved?
- How does the project align with the OIG's current management challenges or internal control weaknesses identified at the EPA or the CSB?
- Are programs providing timely, accurate, complete, and useful information for decisionmaking?
- Are computer security and privacy programs comprehensive and actively implemented throughout the organization to balance risk and mission requirements?
- What are the conditions or changes since the prior audit was conducted by the OIG, the GAO, or other auditing body?
- What new information or indications of auditable issues are available?

Estimated return on investment:

- What is the potential environmental or human health benefit (return on investment) to be derived, and how extensive is the potential for reduction or prevention of environmental, human health, or business risks?
- What is the expected return on investment (e.g., potential questioned costs, funds put to better use, or other potential monetary benefits, improved decision-making, improved data quality and reliability, reduced vulnerabilities, and strengthened internal control)?
- Are programs performing with the greatest efficiency and effectiveness regarding allocation and application of resources?

Risk of fraud, waste, or abuse:

• What resources, data, physical or cybersecurity equipment, program integrity, and potential violations of laws and regulations are involved?

Impact of current management challenges or internal control weaknesses:

- How does the project align with the OIG's current management challenges or internal control weaknesses identified at the EPA or the CSB?
- Are programs providing timely, accurate, complete, and useful information for decision-making?
- Are computer security and privacy programs comprehensive and actively implemented throughout the organization to balance risk and mission requirements?

Prior audit results:

- What are the conditions or changes since the prior audit was conducted by the OIG, the GAO, or other auditing body?
- What new information or indications of auditable issues are available?

Identifying Risks at EPA

Top EPA Management Challenges - Reported by OIG in FY 2019

The OIG reviewed major challenges (including an analysis of relevant risks) and planning priorities across the EPA and solicited input from Agency leadership to identify OIG topics of interest that would be of greatest benefit to the Agency and the American public. This section summarizes the Agency's key management challenges identified by the OIG in FY 2019, which will help guide the general direction and focus of OIG audits, evaluations, and investigative work in FY 2020.

OIG-identified key management challenges for the EPA	FY 2018	FY 2019
Oversight of states, territories, and tribes authorized to accomplish environmental goals: The EPA has made important progress, but our work continues to identify challenges throughout Agency programs and regions, and many of our recommendations to establish consistent baselines and monitor programs are still not fully implemented.	•	•
Enhancing information technology security to combat cyber threats (formerly Limited Capability to Respond to Cyber Security Attacks): Though the EPA continues to initiate actions to further strengthen or improve its information security program, the Agency lacks a holistic approach to managing accountability over its contractors and lacks follow-up on corrective actions taken.	•	•
Workforce planning/workload analysis: The EPA needs to identify its workload needs so that it can more effectively prioritize and allocate limited resources to accomplish its work.	•	•
Mandated reporting requirements: The Agency faces challenges in tracking and submitting reports mandated by law that contain key program information for Congress, the EPA Administrator, and the public.	•	•
Data quality for program performance and decision-making: Poor data quality negatively impacts the EPA's effectiveness in overseeing programs that directly impact public health.	•	•
The EPA needs to improve risk communication to provide individuals and communities with sufficient information to make informed decisions to protect their health and the environment: In 2018, the EPA Administrator identified risk communication as a top priority. Our recent reports indicate risk communication challenges across many EPA programs.		•

Matrix of EPA Goals and Strategies OA&E Plans to Address with Audits and Evaluations

When conducting our audits and evaluations during FY 2020, we will consider the EPA's FY 2018–2022 strategic goals. The table below shows how our planned audits and evaluations align with each of the Agency's objectives.

	EPA's FY 2018–2022 Strategic Objectives							
		Provide for		Ensure	Prioritize		Partner with	
	Improve air	clean and	Revitalize land	safety of	robust	Compliance	states and other	Operate efficiently
	quality	safe water	and prevent	chemicals	science	with the law	stakeholders	and effectively
Planned FY 2020 OIG Projects	(Objective	(Objective	contamination	(Objective	(Objective	(Objective	(Objectives 2.1,	(Objectives 3.2, 3.4,
	1.1)	1.2)	(Objective 1.3)	1.4)	3.3)	3.1)	2.2)	3.5)
Air Directorate								
Status of the Clean Air Act State								
Implementation Plan Submittals	Х					Х		X
and Approvals								
Audit Follow-Up Assignment	Х					Х		
EPA's School Siting Guidelines	Х					Х	х	
Contract and Assistance								
Agreement Directorate								
EPA Improper Payments						Х		Х
Reporting for FY 2019								
Cincinnati Finance Center - Travel						Х		Х
Card Audit								
Purchase Card and Convenience						Х		X
Check Audit								
Agency Use of Blanket Purchase						Х		x
Agreements								
Enterprise Acquisition System						Х		X
Data Integrity – Input into The								
System								
Enterprise Acquisition System						Х		Х
Data Integrity – Controls over								
Contract Clauses								
Efficiency Directorate								
EPA's Lab Consolidation Efforts at					Х			X
Three of Its Laboratory Facilities	1							
Implementation of Federal Green						.,		.,
Challenge and Compliance with						Х		X
Executive Order 13834	-							
Awarded Diesel Emissions	X							X
Reduction Act Grants	1							
Compliance with Regulations Concerning Federal Contractors						х		x
that Have Tax Debt						^		^
Environmental Research								
Programs Directorate								
Action Development Process for		.,				.,		.,
Rulemaking	X	Х				Х		Х
Hotline: Evaluating EPA's								
Response to Findings from Audits						1		
and Inspections Related to Its					Х	1		Х
National Enforcement						1		
Investigations Center								
EPA's Peer Review Process					Х			x
Financial Directorate								
FY 2019 Financial Statements:								
Hazardous Waste Electronic			X			1		Х
Manifest System Fund								

	EPA's FY 2018–2022 Strategic Objectives							
		Provide for		Ensure	Prioritize		Partner with	
	Improve air		Revitalize land		robust	Compliance		Operate efficiently
	quality	safe water		chemicals	science	with the law	stakeholders	and effectively
Planned FY 2020 OIG Projects	(Objective	(Objective	contamination	(Objective	(Objective	(Objective	(Objectives 2.1,	(Objectives 3.2, 3.4,
	1.1)	1.2)	(Objective 1.3)	1.4)	3.3)	3.1)	2.2)	3.5)
FY 2019 Financial Statements:								
Pesticides Registration Fund				Х				x
(Pesticide Registration								,
Improvement Act of 2003) (PRIA)								
FY 2019 Financial Statements:								
Pesticides Reregistration and				Χ				X
Expedited Processing Fund								
(FIFRA) FY 2020 EPA Financial Statements								X
FY 2019 Financial Statements:								^
Frank R. Lautenberg Chemical				Х				X
Safety for the 21st Century Act				^				^
Forensic Directorate								
FY 2020 Single Audit Program							Х	Х
Office of Air and Radiation's							^	^
National Center for Radiation	Х					Х		
Field Operations Preparedness								
EPA's Working Capital Fund								
Operations, Expenditures, and								x
Rate Establishment								
EPA's Awarding of Performance							Х	Х
Partnership Grants								
Puerto Rico Follow-Up Audit						Х	Х	Х
<u> </u>						^	^	^
Information Resources								
Management Directorate								
EPA's Compliance with the						.,		.,
Federal Information Security						Х		X
Modernization Act for FY 2020								
Evaluation of Region 5 Processes for Investigating Potential Loss of						X		x
Records						^		^
Evaluation of Practices for								
Identifying Potential Information								
Technology Vulnerabilities that						Х		x
Could Compromise EPA Systems								,
and Data								
Evaluation of the Information								
Technology Support Services								V
Performed Under the ATTAIN						Х		X
Contract								
Land Cleanup and Waste								
Management Directorate								
Congressional Request Regarding								
the Use of EPA Data to Prevent			x					x
Disproportionate Burden of								
Exposure								
Reviewing and Updating Soil			V					V
Sampling and Analysis Techniques			Х					X
in EPA's Superfund Program Toxics, Chemical Management,								
and Pollution Prevention								
Directorate								
Cape Fear North Carolina GenX								
Contamination				Х		Х	X	Х
EPA's Adherence to Pesticide								
Registration Risk Assessment								
Regulations, Policies, and				Х		Х		
Procedures								
			l			<u> </u>		

	EPA's FY 2018–2022 Strategic Objectives							
		Provide for		Ensure	Prioritize		Partner with	
	Improve air	clean and	Revitalize land	safety of	robust	•	states and other	•
	quality	safe water	and prevent	chemicals	science	with the law	stakeholders	and effectively
Planned FY 2020 OIG Projects	(Objective	, ,	contamination	, ,	(Objective	(Objective	(Objectives 2.1,	(Objectives 3.2, 3.4,
	1.1)	1.2)	(Objective 1.3)	1.4)	3.3)	3.1)	2.2)	3.5)
EPA's Implementation of the								
Endocrine Disruption Screening				Х			X	Х
Program								
FIFRA Special Local Needs			×	Х			Х	Х
Exemptions for Pesticides			^					^
Dicamba New Use Registration				Χ		X		X
Water Directorate								
Plastics in U.S. Waters		Χ						X
Follow-Up Evaluation of OIG								
Report "EPA Has Not Reported to								
Congress on BEACH Act Progress		Χ						X
as Statutorily Required or Fully								
Documented Budget Decisions"								
Harmful Algal Blooms		Х						X
EPA's Oversight of Tribal Drinking		Х	x	Х	Х	X	Х	
Water Systems		^	^	Λ	^	^	Α	
Protecting Drinking Water from		Х		Х	Х	Х		
Effects of Wildfires		^		Λ	^	^		
Immediate Office for OA&E								
EPA FY 2020 Management	X	Х	×	Х		Х	Х	Х
Challenges	^	٨	^	Χ		^	Χ	X
Quality Control Review of OIG								Х
Reports Issued in FY 2019								^
FY 2020 Semiannual Report to								
Congress (for the period ending								X
March 31, 2020)								

As of February 2020, the following reports have been issued for FY 2020:

	Report Title	Directorate	Report No.	Date Issued
1	Region 4 Quickly Assessed Water Systems After Hurricane Irma but Can Improve Emergency Preparedness	Water	<u>20-P-0001</u>	October 7, 2019
2	EPA's Purchase Card and Convenience Check Program Merits an Audit in Fiscal Year 2020	Contracts and Assistance Agreement	20-P-0006	October 18, 2019
3	Management Alert: EPA Still Unable to Validate that Contractors Received Role-Based Training for Information Security Protection	Information Resources Management	20-P-0007	October 21, 2019
4	EPA Adequately Managed Hurricane Harvey Funding Received from FEMA	Efficiency	20-P-0010	October 23, 2019
5	While EPA Regions Enforce at Six Superfund Sites Reviewed, Four of Those Sites Remain in Significant Noncompliance, and Nationwide Reporting and Tracking Can Be Improved	Land Cleanup and Waste Management	20-P-0011	October 24, 2019
6	Tribal Pesticide Enforcement Comes Close to Achieving EPA Goals, but 'Circuit Rider' Inspector Guidance Needed	Toxics, Chemical Management, and Pollution Prevention	20-P-0012	October 29, 2019
7	EPA Budget Systems Need Improved Oversight of Security Controls Testing	Information Resources Management	20-P-0015	November 1, 2019
8	EPA's Fiscal Year 2019 First Quarter Compliance with the Digital Accountability and Transparency Act of 2014	Financial	<u>20-P-0026</u>	November 8, 2019
9	Management Alert: Unapproved Use of Slag at Anaconda Co. Smelter Superfund Site	Land Cleanup and Waste Management	<u>20-N-0030</u>	November 18, 2019
10	Audit of the U.S. Chemical Safety and Hazard Investigation Board's Fiscal Years 2019 and 2018 Financial Statements	Financial	<u>20-F-0032</u>	November 19, 2019
11	EPA's Fiscal Years 2019 and 2018 (Restated) Consolidated Financial Statements	Financial	<u>20-F-0033</u>	November 19, 2019
12	EPA Failed to Develop Required Cost and Benefit Analyses and to Assess Air Quality Impacts on Children's Health for Proposed Glider Repeal Rule Allowing Used Engines in Heavy-Duty Trucks	Environmental Research Programs	20-P-0047	December 5, 2019
13	Despite Requirements of Inspector General Act, Chief of Staff Refuses to Provide Agency Information for OIG Evaluation; Required Whistleblower Training Does Not Address Interference with or Intimidation of Congressional Witnesses	Forensic	20-E-0053	December 10, 2019
14	EPA Needs to Improve Its Emergency Planning to Better Address Air Quality Concerns During Future Disasters	Air	20-P-0062	December 16, 2019
15	Outdated EPA Leave Manual and Control Weaknesses Caused Irregularities in the Office of Air and Radiation's Timekeeping Practices	Forensic	<u>20-P-0063</u>	December 19, 2019
16	EPA Needs to Improve Management and Monitoring of Time-Off Awards	Forensic	<u>20-P-0065</u>	December 30, 2019
17	EPA Can Improve Incident Readiness with Better Management of Homeland Security and Emergency Response Equipment	Efficiency	<u>20-P-0066</u>	January 3, 2020
18	EPA Should Improve Oversight of Mobile Phones	Efficiency	20-P-0068	January 10, 2020
19	U.S. Chemical Safety and Hazard Investigation Board's Compliance in Fiscal Year 2019 with Improper Payments Legislation and Guidance	Efficiency	20-N-0064	January 23, 2020
20	CSB's Information Security Program Is Defined, but Improvements Needed in Risk Management, Identity and Access Management, and Incident Response	Information Resources Management	20-P-0077	February 12, 2020
21	Management Controls Needed to Verify and Report Border 2020 Program Accomplishments	Toxics, Chemical Management, and Pollution Prevention	20-P-0083	February 18, 2020

Identifying Risks at CSB

Top CSB Management Challenges — Reported by OIG in FY 2019

The OIG reviewed the major risks, challenges, and planning priorities across the CSB and solicited input from leadership to identify and select OIG topics of interest that would be of greatest benefit to the board and the American public. This section summarizes the CSB's key management challenges identified by the OIG in FY 2019, which will help guide the general direction and focus of OIG audit and investigative work in FY 2020.

Without New Members by August 2020, the CSB Governing Body Cannot Complete Its Mission or Meet Its Goals

As of May 2019, there was a risk that the CSB could have a governing body consisting of one member by February 2020 and have no governing body by August 2020 because of term expiration dates and the time it takes to select, nominate, and confirm a board member. With one member, it is uncertain whether a quorum can be established. The governing body must obtain a quorum to meet its mission and goals because staff do not have the authority to carry out functions such as budgeting, planning, oversight, and approval of investigations.

Congress has documented its support of the CSB mission to the current administration in letters to the White House Chief of Staff in August 2018 and October 2018. In those letters, members urged the administration to fill the Chairperson position and other governing body vacancies. The CSB Interim Executive Authority met with the White House Office of Presidential Personnel in February 2019 and discussed the roles and responsibilities of the board members and what experiences the nominees should have. Given the amount of time necessary to identify, nominate, and confirm a board member, there is a high risk that the governing body could be reduced to a level that would not allow a quorum required to govern CSB operations.

The CSB Has Not Developed Guidance on Board Member Responsibilities

CSB board members and managers asserted that there were multiple instances in FY 2018 when a board member acted inconsistently with established practices or inappropriately provided information to entities outside the CSB. Specifically, a board member publicized budget information before it was presented to Congress, attempted to share information with one stakeholder before sharing it with all stakeholders, and made comments on a proposed rule before a CSB position was developed.

In December 2018, the board members stated that there have been no new incidents of improper communications from board members. Several people we interviewed—including board members, the acting General Counsel and the Senior Advisor to the CSB—attributed this development to better communication among staff and the board members.

The lack of additional incidents in FY 2019 is a positive sign for the board; however, guidance is needed to define the roles of the board members. The CSB authorizing legislation does not create a supervisory role for the Chairperson with respect to the other board members. Without the explicit authority for the Chairperson to hold board members accountable, an environment exists

that enables behaviors that impede the CSB's mission and lowers morale among CSB career staff.

Matrix of CSB Goals OIG Plans to Address with Audits

When conducting our mandated work during FY 2020, we will consider the CSB's three strategic goals outlined in its FY 2017–2021 Strategic Plan. The table below shows how our planned FY 2020 audits and evaluations align with each of the CSB's goals.

	CSB's FY 2017–2021 Strategic Goals				
Planned FY 2020 OIG projects	Prevent recurrence of significant chemical incidents through independent investigations	Advocate safety and achieve change through recommendations, outreach, and education	Create and maintain an engaged, high-performing workforce		
Financial Directorate					
FY 2020 CSB Financial Statements (Contracted)			X		
Information Resources Management Directorate					
CSB Compliance with the FISMA for FY 2020			X		
Immediate Office for OA&E					
CSB FY 2020 Management Challenges	X	X	X		

The following sections detail specific work that will be continued or initiated in FY 2020 within each OA&E directorate.

Air Directorate

The Air Directorate is responsible for conducting assignments to assess the EPA's programs and activities to protect human health and the environment through air quality goals.

Point of Contact: Jim Hatfield, Director, (919) 541-1030

Title	Primary objectives	Estimated/actual start date
Carryover		
EPA's Indian Country New	Determine the EPA's progress in implementing a Clean Air	Fourth Quarter
Source Review Program	Act preconstruction permitting program for new sources	2018
(OA&E-FY18-0267)	and modifications in Indian Country.	
Landfill Emissions	Determine whether active landfills are operating under	Fourth Quarter
(OA&E-FY18-0273)	the appropriate air quality permit.	2018

Title	Primary objectives	Estimated/actual start date
EPA Actions to Address	Determine whether EPA's residual risk and technology	Second Quarter
Elevated Cancer Risks from Air	review process has sufficiently identified and addressed	2019
Toxics Emissions from Point	any elevated cancer risks from air toxics emitted by major	
Sources	facilities.	
(OA&E-FY19-0091)		
EPA Oversight of Synthetic	Determine whether the EPA and state/local oversight is	First Quarter
Minor Sources	sufficient to assure that "synthetic minor" sources comply	2020
(OA&E-FY19-0093)	with the emission or operational limits in their air	
	permits.	
EPA's External Civil Rights	Determine whether the EPA's External Civil Rights	First Quarter
Compliance Office's Response	Compliance Office has implemented an oversight system	2020
to Title VI Complaints	to provide reasonable assurance that organizations	
(OA&E-FY19-0357)	receiving EPA funds comply with Title VI requirements.	
Mandated		
	NONE	
New Discretionary		
Status of the Clean Air Act	To determine (1) the number of Clean Air Act State	Second Quarter
State Implementation Plan	Implementation Plans awaiting EPA approval; (2) factors	2020
Submittals and Approvals	causing delays in approvals; (3) the extent to which states	
	have not submitted required implementation plans to the	
	EPA; (4) the potential impact of delays in implementation	
	plans processing on achieving air quality standards; and	
	(5) what steps EPA is taking to address delays in	
	processing.	
Audit Follow-Up Assignment	Determine whether the EPA implemented the audit	Second Quarter
	report's recommendations.	2020
EPA's School Siting Guidelines	Determine whether and how the EPA is measuring the	Third Quarter
	success or progress of the School Siting Guidelines to	2020
	improve indoor air quality in schools.	

Contract and Assistance Agreement Directorate

The Contract and Assistance Agreement Directorate is responsible for conducting assignments on the EPA's management of contracts, grants, cooperative agreements, and interagency agreements.

Point of Contact: Khadija Walker, Director, (312) 886-3106

Title	Primary objectives	Estimated/actual start date
Carryover		
Hotline Compliant 2018-0227	Determine whether funding actions taken by the EPA are	Third Quarter
- Contract Compliance for EPA	allowed; they cause risks to the Agency; and invoices are	2018
Contract EP-C-16-001	being approved and paid without proper review of costs.	
(OA&E-FY18-0234)		

		Estimated/actual
Title	Primary objectives	start date
Oversight of Office of	Determine whether (1) the Office of Research and	Third Quarter
Research and Development	Development oversees and monitors grants awarded to	2018
Grants to Universities	universities in accordance with applicable laws,	
(OA&E-FY18-0248)	regulations, policies, and procedures and (2) university	
	grantees are completing agreed upon work which meets	
	the defined purpose of the grant.	
EPA Oversight of Assistance	Eetermine (1) the dollar amount of EPA awards that have	Fourth Quarter
Agreement Close-Out (per the	expired at least two years ago with unliquidated	2018
Grants Oversight and New	obligations or zero obligations remaining, and whether	
Efficiency Act)	the EPA has complied with RMDS 2520-03-p2, EPA Order	
(OA&E-FY18-0250)	5700.6A2 Policy on Compliance, EPA Order 1610, and	
	Office of Management and Budget Uniform Grants	
	Guidance §200.343; (2) the reasons the EPA carried	
	expired awards for two or more years (potential scenarios	
	include administrative documentation not submitted to	
	the EPA, programmatic documentation (final reports) not	
	submitted to the EPA, or projects not completed); and (3)	
	the impact of the expired awards, such as the financial	
	impact of unliquidated obligations and debt costs,	
	potential environmental and public health results from	
	projects not completed, or unspent funds.	
Office of the Chief Financial	To determine whether (1) contracts EPW18007 and	First Quarter
Officer Contract Award -	EPW18008 were properly awarded in accordance with	2019
Hotline Complaint	Federal Acquisition Regulation competition requirements,	
(OA&E-FY19-0035)	and (2) equipment purchased under EPW07024 was	
	properly purchased and transferred to current contracts	
	in accordance FAR requirements.	
Mandated		
EPA Improper Payments	To evaluate EPA's reporting of improper payments during	First Quarter
Reporting for FY 2019	FY 2019.	2020
Cincinnati Finance Center -	Evaluate the EPA's internal control over travel cards and	Second Quarter
Travel Card Audit	determine the risk of illegal, improper, or erroneous use	2020
	of travel cards.	
Purchase Card and	Determine whether the EPA has implemented corrective	Fourth Quarter
Convenience Check Audit	actions to reduce the potential for illegal, improper, or	2020
	erroneous use of purchase cards and convenience checks.	
New Discretionary	Determine whether (4) blendet acceptance	Cocond Owents
Agency Use of Blanket	Determine whether (1) blanket purchase agreements	Second Quarter
Purchase Agreements	comply with applicable laws, regulations, contract	2020
	provisions, and other requirements; and (2)	
	the EPA is maximizing usage of current blanket purchase	
	agreements to achieve savings and whether other blanket	
Enterprise Acquisition System	purchase agreement opportunities exist.	Cocond Ouerter
Enterprise Acquisition System	To determine the validity, completeness, and accuracy of Enterprise Acquisition System data for reliability purposes	Second Quarter 2020
Data Integrity - Input into the		2020
System	and to assess its timeliness, availability, and ease of use to obtain data needed.	
Enterprise Acquisition System		Third Ougston
Enterprise Acquisition System Data Integrity - Controls over	To determine compliance with FAR regulations and EPA criteria.	Third Quarter 2020
Contract Clauses	Citteria.	2020
Contract Clauses		

Efficiency Directorate

The Efficiency Directorate is responsible for identifying ways for EPA and CSB programs and operations to improve processes and realize cost savings, thus freeing resources for high-priority environmental projects.

Point of Contact: Mike Davis, Director, (513) 487-2363

		Estimated/actual
Title	Primary objectives	start date
Carryover		
PeoplePlus Efficiency and	Determine whether PeoplePlus is efficient and effective for	First Quarter
Effectiveness	use in the time and attendance and cost allocation	2019
(OA&E-FY18-0283)	processes and has effective practices, programs, and	
	policies.	
EPA's Risk Assessment	Determine whether the EPA is following GAO's standards	First Quarter
Process	for required risk assessments among its 104 programs (or a	2019
(OA&E-FY19-0034)	sample within the 104). We would determine the Internal	
	Control in the Federal Government and Office of	
	Management and Budget Circular A-123 for preparing risk	
	assessments for programs. We would determine the rate	
	at which the EPA has not conducted why risk assessments	
	were not conducted. Our audit will focus on the GAO's	
	second of the five internal control standards for federal	
Indian Tribal Grants	programs—risk assessment. Determine whether the costs claimed under selected,	Fourth Quarter
(OA&E-FY19-0314)	individual Indian tribal grants are reasonable, allocable,	2019
(OA&E-F119-0314)	and allowable in accordance with applicable laws,	2019
	regulations, and grant terms and conditions.	
Mandated	regulations, and grant terms and conditions.	
	NONE	
New Discretionary		
EPA's Lab Consolidation	Determine whether the EPA's consolidation efforts at	First Quarter
Efforts at Three of Its	laboratories in Athens, Georgia; Corvallis, Oregon; and	2020
Laboratory Facilities	Grosse Ile, Mississippi; are within cost and on schedule.	
Implementation of Federal	Determine the extent to which the EPA has implemented	First Quarter
Green Challenge and	the Federal Green Challenge and whether implementation	2020
Compliance with Executive	has influenced reducing building operations cost in	
Order 13834	compliance with Executive Order 13834.	
Awarded Diesel Emissions	Determine whether (1) competitive grants funded under	Second Quarter
Reduction Act Grants	the Diesel Emissions Reduction Act for the Clean Diesel	2020
	Funding Assistance Program and spent by recipients were	
	allowable, allocable, and reasonably awarded, and (2) the	
	program was executed efficiently.	
Compliance with Regulations	Determine whether the EPA is (1) awarding contracts to	Second Quarter
Concerning Federal	contractors with tax debt and (2) complying with applicable	2020
Contractors that Have Tax	laws, regulations, policies, and procedures for the	
Debt	management of federal contractors with tax debts.	

Environmental Research Programs Directorate

The Environmental Research Programs Directorate conducts independent assignments that look at the EPA's research and development programs, with a focus on areas that support human health and environmental protection.

Point of Contact: Patrick Gilbride, Director, (303) 312-6969

Title	Primary objectives	Estimated/actual start date
Carryover		
Implementation of the EPA's Scientific Integrity Policy (OA&E-FY18-0272)	Examine whether the EPA's Scientific Integrity Policy is being implemented as intended to assure scientific integrity throughout the EPA. In particular, the project will examine (1) extent and type of employee concerns, if any, with scientific integrity at the EPA; (2) employee awareness of the EPA's Scientific Integrity Policy, including the process for reporting potential violations; (3) reasons for any non-reporting of potential violations; and (4) the adjudication process in general and any concerns, such as satisfaction with complaint resolution, timeliness of resolution, and other process-related issues.	Fourth Quarter 2018
Congressional Request on Glider Proposed Rule Making (OA&E-FY19-0053)	Determine whether the EPA complied with Executive Orders 12866 and 13045 in developing EPA proposed rulemaking "Repeal of Emission Requirements for Glider Vehicles, Glider Engines, and Glider Kits."	First Quarter 2019
Hotline: Office of Mission Support Controls for Carrying Out Its Responsibility to Develop and Coordinate an Agencywide Quality System (OA&E-FY19-0329)	Determine whether the Office of Mission Support has controls in place to carry out its responsibility in developing and coordinating the mandatory Agencywide Quality System.	Fourth Quarter 2019
Mandated		
	NONE	
New Discretionary Action Development Process for Rulemaking (OA&E-FY20-0067)	Determine whether the EPA adhered to its Action Development Process for selected rulemakings.	First Quarter 2020
Hotline: Evaluating EPA's Response to Findings from Audits and Inspections Related to Its National Enforcement Investigations Center (OA&E-FY20-0099)	Determine whether the Office of Enforcement and Compliance Assurance's Office of Criminal Enforcement, Forensics, and Training and the National Enforcement Investigations Center are addressing findings and implementing corrective actions from audits, inspections, and documented concerns related to the National Enforcement Investigations Center.	Second Quarter 2020
EPA's Peer Review Process	Determine whether the EPA complies with its peer review process, including documenting decisions/justifications to not conduct peer reviews and any potential impacts to Agency decision-making stemming from noncompliance. The Office of Research and Development's Office of the Science Advisor is responsible for peer reviews.	Fourth Quarter 2020

Financial Directorate

The Financial Directorate is responsible for rendering opinions on financial statements produced by the EPA and the CSB, and it conducts audits of other EPA financial matters for efficiency and effectiveness.

Point of Contact: Paul Curtis, Director, (202) 566-2523

Title	Primary objectives	Estimated/actual start date
Carryover		
FY 2018 Financial Statements: Hazardous Waste Electronic Manifest System Fund (OA&E-FY19-0120)	Determine whether (1) financial statements were fairly presented in all material respects; (2) internal control over financial reporting was in place; and (3) management complied with applicable laws and regulations.	First Quarter 2019
FY 2018 Financial Statements: Pesticides Registration Fund (PRIA) (OA&E-FY19-0121)	Render an opinion on the Agency's PRIA financial statements and determine compliance with laws and regulations, effectiveness of internal control, and accuracy of reported performance information.	First Quarter 2019
FY 2018 Financial Statements: Pesticides Reregistration and Expedited Processing Fund (FIFRA) (OA&E-FY19-0122)	Render an opinion on the Agency's FIFRA financial statements and determine compliance with laws and regulations, effectiveness of internal control, and accuracy of reported performance information.	First Quarter 2019
Mandated		
FY 2019 Financial Statements: Hazardous Waste Electronic Manifest System Fund	Determine whether (1) financial statements were fairly presented in all material respects, (2) internal control over financial reporting was in place, and (3) management complied with applicable laws and regulations.	Second Quarter 2020
FY 2019 Financial Statements: Pesticides Registration Fund (Pesticide Registration Improvement Act of 2003) (PRIA)	Render an opinion on the Agency's PRIA financial statements and determine (1) compliance with laws and regulations, (2) effectiveness of internal control, and (3) accuracy of reported performance information.	Second Quarter 2020
FY 2019 Financial Statements: Pesticides Reregistration and Expedited Processing Fund (FIFRA)	Render an opinion on the Agency's FIFRA financial statements and determine (1) compliance with laws and regulations, (2) effectiveness of internal control, and (3) accuracy of reported performance information.	Second Quarter 2020
FY 2020 EPA Financial Statements	Determine whether (1) consolidated financial statements were fairly stated in all material respects, (2) internal control over financial reporting were in place, and (3) management complied with applicable laws and regulations.	Third Quarter 2020

Title	Primary objectives	Estimated/actual start date
FY 2019 Financial Statements: Frank R. Lautenberg Chemical Safety for the 21st Century Act	Render an opinion on the Agency's financial statements and determine whether (1) the financial statements required by the Frank R. Lautenberg Chemical Safety for the 21st Century Act were fairly presented in all material respects, (2) the EPA's internal control over financial reporting were in place, and (3) EPA management complied with applicable laws and regulations.	Third Quarter 2020
FY 2020 CSB Financial Statements (Contracted)	Determine whether (1) financial statements were fairly stated in all material respects, (2) internal control over financial reporting were in place, and (3) management complied with applicable laws and regulations.	Fourth Quarter 2020

Forensic Directorate

The Forensic Directorate is responsible for conducting audits of EPA assistance agreements and contracts to identify potentially fraudulent actions. This directorate also determines the acceptability of costs claimed under specific financial instruments. Forensic audits apply auditing skills to situations with legal consequences and use risk assessment tools to represent the first line of defense against fraud, waste, and abuse in Agency programs.

Point of Contact: John Trefry, Director, (202) 566-2474

		Estimated/actual
Title	Primary objectives	start date
Carryover		
Office of Air and	Examine the Office of Air and Radiation's timekeeping	Second Quarter
Radiation Timekeeping	practices to determine whether they comply with Agency	2017
Practices	policies and procedures, and relevant regulations.	
(OA-FY17-0090)		
Salary Overpayment and	The purpose of this audit is to determine whether the Agency	Second Quarter
Debt Forgiveness Process	is properly collecting salary overpayments from its employees.	2018
(OA-FY18-0084)		
EPA's Use of	Determine whether the EPA is using the Intergovernmental	Fourth Quarter
Intergovernmental	Personnel Act Agreements and detail instruments to achieve	2019
Personnel Act	the results intended.	
Agreements and Details		
(OA&E-FY19-0271)		
EPA's Administration of	Determine whether the EPA is effectively managing its Federal	Fourth Quarter
its Federal Employees	Employees Compensation Act program; that it pays only valid	2019
Compensation Act	claims for continuation of benefits; and that adequate case	
Program	management exists.	
(OA&E-FY19-0292)		

Title	Primary objectives	Estimated/actual start date
Military Pay-Setting For Reservist Differential and Active Duty Pay (OA&E-FY19-0286)	Determine whether (1) the EPA has established effective controls to prevent or detect reservist differential errors and overpayments and collect any resulting debt; and (2) reservists called to active duty under 5 U.S.C. § 6323 (a and b) are having their civilian pay reduced as required. Under 5 U.S.C. 5538, employing agencies must pay differential payments to eligible federal civilian employees who are members of the Reserve or National Guard called or ordered to active duty under certain specified provisions of law.	Fourth Quarter 2019
Mandated		
FY 2020 Single Audit Program	Conduct reviews of and process single audit reports that are prepared by Certified Public Accountant firms and state audit organizations.	First Quarter 2020
New Discretionary		
Office of Air and Radiation's National Center for Radiation Field Operations Preparedness	Determine whether the National Center for Radiation Field Operations is prepared for and capable of performing its current roles and responsibilities in responding to radiological emergencies.	Second Quarter 2020
EPA's Working Capital Fund Operations, Expenditures, and Rate Establishment	Determine whether the EPA's (1) Working Capital Fund is operating efficiently by keeping expenditures low; (2) the basis of rates established for various services is properly supported; and (3) allocations of costs to the Working Capital Fund are reasonable, allowable, and proper.	Second Quarter 2020
EPA's Awarding of Performance Partnership Grants	Determine whether the EPA is awarding Performance Partnership Grants to eligible applicants.	Second Quarter 2020
Puerto Rico Follow-Up Audit	Determine whether Puerto Rico has implemented controls to maintain the integrity of its Clean Water State Revolving Fund and Drinking Water State Revolving Fund, and has the resources needed to provide effective management and oversight of the programs.	Fourth Quarter 2020

Information Resources Management Directorate

The Information Resources Management Directorate reviews the economy, efficiency, and effectiveness of EPA and CSB investments in systems for achieving environmental goals and ensuring the integrity of data used for decision-making. The directorate also reviews strategies for setting priorities and developing plans to accomplish priorities and measure performance.

Point of Contact: Rudolph Brevard, Director, (202) 566-0893

Title	Primary objectives	Estimated/actual start date
Carryover		
CSB's Compliance with the FISMA for FY 2019 (OA&E-FY19-0213)	Determine whether the CSB implemented an information security management program compliant with the FISMA of 2014.	Third Quarter 2019
EPA's Compliance with the FISMA for FY 2019 (OA&E-FY19-0208)	Determine whether the EPA implemented an information systems security program that is compliant with the requirements outlined in the FISMA of 2014.	Third Quarter 2019

Title	Primary objectives	Estimated/actual start date
Mandated		
CSB's Compliance with the FISMA for FY 2020	Determine whether the CSB implemented an information security management program compliant with the FISMA of 2014.	Third Quarter 2020
EPA's Compliance with the FISMA for FY 2020	Determine whether the EPA implemented an information systems security program that is compliant with the requirements outlined in the FISMA of 2014.	Third Quarter 2020
New Discretionary		
Evaluation of Region 5 Processes for Investigating Potential Loss of Records	Determine whether (1) Region 5 lost federal records when transferring computer files during its annual data backup process and (2) Region 5 followed its processes to investigate the potential loss of records.	Second Quarter 2020
Evaluation of Practices for Identifying Potential Information Technology Vulnerabilities that Could Compromise EPA Systems and Data	Evaluate the completeness of the EPA processes for testing its network to identify potential vulnerabilities that could compromise the Agency's systems and data. Conduct independent automated vulnerability testing of IT resources connected to EPA's network to identify potential vulnerabilities that could be used to compromise the confidentiality, integrity, and availability of Agency information systems and data.	Second Quarter 2020
Evaluation of the Information Technology Support Services Performed Under the ATTAIN Contract	Determine whether the EPA paid ATTAIN, its IT support contractor, for services that were either (1) not performed or (2) performed by other EPA contractors.	Second Quarter 2020

Land Cleanup and Waste Management Directorate

The Land Cleanup and Waste Management Directorate is responsible for conducting assignments to assess EPA programs, activities, and initiatives to protect human health and the environment through cleanup and waste management, accident prevention, and emergency response.

Point of Contact: Tina Lovingood, Director, (202) 566-2906

Title	Primary objectives	Estimated/actual start date
Carryover		
EPA Enforcement of Toxic	Determine whether the EPA is taking enforcement actions	First Quarter
Release Inventory Late	against companies that delay reporting chemical release data	2019
Reporter	required by Toxic Release Inventory criteria.	
(OA&E-FY18-0002)		

Title	Primary objectives	Estimated/actual start date
Communication of Human Health Risk at Sites in Office of Land and Emergency Management's Programs (OA&E-FY19-0031)	Determine whether the EPA is communicating sampling results or other indicators of human health risk at select EPA-led sites in the Office of Land and Emergency Management programs in a manner that allows the impacted communities to avoid exposure to harmful contaminants or substances.	First Quarter 2019
Superfund Site Visits (OA&E-FY19-0090)	Verify the effectiveness of institutional controls.	Fourth Quarter 2019
Post-Closure Care at Hazardous Waste Units Closed with Waste in Place (OA&E-FY19-0323)	Evaluate the EPA's oversight of hazardous waste units closed with waste in place to verify continued protection of human health and the environment.	Fourth Quarter 2019
Mandated		
	NONE	
New Discretionary		
Congressional Request Regarding the Use of EPA Data to Prevent Disproportionate Burden of Exposure	Determine how the EPA Land programs (Superfund and Resource Conservation and Recovery Act) are using EPA data to prevent disproportionate burden of exposure to any community.	Second Quarter 2020
Reviewing and Updating Soil Sampling and Analysis Techniques in EPA's Superfund Program	Determine whether the EPA's Superfund program is effectively reviewing and updating soil sampling and analysis techniques.	Third Quarter 2020

Toxics, Chemical Management, and Pollution Prevention Directorate

The Toxics, Chemical Management, and Pollution Prevention Directorate is responsible for conducting assignments to assess the EPA's management of chemical risks and programs to prevent pollution.

Point of Contact: Jeffrey Harris, Director, (202) 566-0831

Title	Primary objectives	Estimated/actual start date
Carryover		
Lautenberg Chemical	Determine whether (1) Office of Chemical Safety and	Third Quarter
Safety Act Resource	Pollution Prevention/Office of Prevention, Pesticides, and	2019
Planning and Management	Toxic Substances has met all Lautenberg Act deadlines to	
(OA&E-FY19-0127)	date, and whether the Office of Prevention, Pesticides, and	
	Toxic Substances has developed management plans and	
	internal management controls to meet the ongoing	
	statutory requirements of the law; and (2) the Office of	
	Prevention, Pesticides, and Toxic Substances developed and	
	implemented all requirements of the Lautenberg Act,	
	including management and planning steps, implementation	
	processes, internal control, and alternative plans for	
	meeting statutory deadlines regardless of resource or	
	human capital allocations.	

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Title	Primary objectives	Estimated/actual start date
Border 2020 Program	To evaluate the effectiveness of the Border 2020 program	Fourth Quarter
(OA&E-FY19-0245)	controls implemented in response to the 2008 OIG review,	2019
(OA&E-F119-0243)	determine: (1) whether current program controls (strategic	2019
	plan, performance measures, action plans in EPA Regions 6	
	and 9, grantee and partner guidance on project	
	documentation, and data quality) are sufficient for verifying	
	that program objectives and activities are accomplished and	
	are linked to the achievement of desired environmental and	
	human health goals and benefits; and (2) the progress the	
	program demonstrates toward achieving environmental	
	objectives (e.g. promote access to safe drinking water for	
	5,000 households, maintain effective air monitoring	
	networks) in its strategic plan that were scheduled for	
	completion in 2014, 2015, and 2018.	
Mandated		
	NONE	
New Discretionary		
Cape Fear North Carolina	Determine what actions the EPA took to verify compliance	Second Quarter
GenX Contamination	with requirements of its administrative 2009 Toxic	2020
(OA&E-FY19-0348)	Substances Control Act consent order with Chemours	
	(Dupont) to prevent release of the chemical GenX in the	
	Cape Fear River basin.	
EPA's Adherence to	Determine the EPA's adherence to applicable regulations,	Second Quarter
Pesticide Registration Risk	policies, and procedures in assessing risks to human health	2020
Assessment Regulations,	and the environment in the pesticide registration process.	
Policies, and Procedures		
EPA's Implementation of	Determine the Office of Pesticides Program's (1) progress in	Third Quarter
the Endocrine Disruption	implementing the requirement of Section 408(p)(3)(A) of the	2021
Screening Program	Food Quality Protection Act to test all active pesticides for	
	endocrine disruption activity; and (2) compliance with	
	implementing Section 408(p)(6) of the Food Quality	
	Protection Act, which requires the EPA to take action (e.g.,	
	conduct an endocrine disruption risk assessment for the	
	pesticide) if the testing shows that the pesticide disrupts the	
FIEDA Consiell! No. 1	human endocrine system.	Thind Country
FIFRA Special Local Needs	Determine what controls the EPA has in place to verify states	Third Quarter
Exemptions for Pesticides	and whether the EPA is following procedures and policies for	2021
	review and approval of Special Local Needs Exemptions for pesticides.	
Dicamba New Use	Determine whether the EPA adheres to federal requirements	Fourth Quarter
Registration	and scientifically sound principles for the 2016 registration	2021
Registration	and 2018 renewal for the new uses of the Dicamba herbicide.	2021
	Tana 2010 renewal for the new uses of the Dicamba Herbicide.	

Water Directorate

The Water Directorate is responsible for conducting assignments to assess the EPA's protection and restoration of healthy aquatic communities and waters that sustain human health.

Point of Contact: Kathryn Hess, Acting Director, (617) 918-1487

Title	Primary objectives	Estimated/actual start date
Carryover	Trimary objectives	Start date
Hurricane Response for 2017 Storms in Regions 6, 4, and 2 (OPE-FY18-0005)	Determine whether the EPA's preparedness and response efforts during three 2017 hurricanes protected human health and water resources from storm-related drinking and surface water contamination.	Second Quarter 2018
EPA Enforcement Results (2006-2018) (OA&E-FY19-0030)	Identify the (1) trends in enforcement results stemming from the EPA enforcement actions (injunctive relief, supplementary environmental projects, and penalties) over time (2006-2018); and (2) key factors explaining differences in enforcement results stemming from EPA enforcement actions over time among the EPA regions and among environmental statutes.	Fourth Quarter 2019
EPA National Pollutant Discharge Elimination System Permit Review (OA&E-FY19-0340)	Determine whether the EPA's reviews of state-proposed National Pollutant Discharge Elimination System verify that the permits adhere to Clean Water Act requirements.	Fourth Quarter 2019
Mandated		
	NONE	
New Discretionary		
Plastics in U.S. Waters (OA&E-FY19-0086)	Determine how the EPA's Clean Water Act programs protect human health and the environment from plastic pollution and the effectiveness of EPA's research efforts to assess and reduce plastics in U.S. waters.	First Quarter 2020
Follow-Up Evaluation of OIG Report "EPA Has Not Reported to Congress on BEACH Act Progress as Statutorily Required or Fully Documented Budget Decisions" (OA&E-FY20-0062)	Determine whether the EPA implemented a key OIG recommendation in OIG Report "EPA Has Not Reported to Congress on BEACH Act Progress as Statutorily Required or Fully Documented Budget Decisions" issued January 18, 2018.	First Quarter 2020
Harmful Algal Blooms (OA&E-FY19-0085)	Determine how the EPA is addressing harmful algal blooms under the Clean Water Act and Safe Drinking Water Act authorities to protect human health and the environment.	Third Quarter 2020
EPA's Oversight of Tribal Drinking Water Systems	Determine to what extent the EPA has implemented compliance assistance and enforcement activities to help public water systems in Indian Country provide safe drinking water to customers.	Fourth Quarter 2020

Title	Primary objectives	Estimated/actual start date
Protecting Drinking Water from Effects of Wildfires	Determine the extent to which the EPA uses its authorities to confirm that large community water systems adequately assess the risks from wildfires on their ability to provide safe and clean drinking water under the revised Safe Drinking Water Act risk assessment requirement and the Clean Water Act Source Water Protection provision.	Fourth Quarter 2020

Immediate Office

The OA&E's Immediate Office is responsible for conducting new and follow-up audits to assess Agency programs and functions and determining whether sufficient controls are in place to reduce the Agency's risk of fraud, waste, and abuse in its operations. The Immediate Office also develops, coordinates, and reports on OIG-identified Agency management challenges and internal control weaknesses.

Points of Contact: Jerri Dorsey-Hall, Auditor, (919) 541-3601

Michael Petscavage, Auditor, (202) 566-0897

Eric Lewis, Auditor, (202) 566-2664

		Estimated/actual		
Title	Primary objectives	start date		
Carryover				
NONE				
Mandated				
EPA FY 2020 Management	Identify the issues the OIG determines to be major	First Quarter		
Challenges	management challenges for the EPA in FY 2020.	2020		
CSB FY 2020 Management	Identify the issues the OIG has determined to be major	First Quarter		
Challenges	management challenges for the CSB in FY 2020.	2020		
Quality Control Review of	Assess whether there are systemic issues during referencing,	Second Quarter		
OIG Reports Issued in	compliance monitoring reviews, and compliance with	2020		
Fiscal Year 2019	generally accepted government auditing standards and OIG			
	policy.			
FY 2020 Semiannual	Prepare data for the Semiannual Report to Congress for the	Third Quarter		
Report to Congress (for	period ending March 31, 2020, to include the status of	2020		
the period ending	unimplemented recommendations, corrective actions, and			
March 31, 2020)	monetary benefits up to the preceding six-month period			
	ending September 30, 2019.			
New Discretionary				
NONE				

The Plan: Office of Investigations FY 2020 Focus

The OIG's OI is responsible for investigating allegations of criminal activity and serious misconduct involving EPA and CSB programs and operations. Due to the size and scope of the EPA and its mission to protect human health and the environment, the OI often collaborates with other law enforcement entities and external stakeholders to enhance the effectiveness of its work. We participate in interagency task forces and working groups. We also participate in OIG outreach programs by providing fraud awareness briefings to educate Agency employee groups and external organizations that receive EPA funds on potential indicators of fraud.

The Inspector General Act identifies the Assistant Inspector General for Investigations as being responsible for supervising the performance of the investigative activities. The Assistant Inspector General for Investigations' primary responsibilities include conducting criminal, civil, and administrative investigations involving allegations of fraud, waste, and abuse relating to EPA and CSB programs and activities; investigating allegations of serious misconduct by EPA and CSB employees; interfacing with the Department of Justice on OIG-related criminal matters; and coordinating investigations and OIG initiatives with other federal, state, local, and tribal investigative agencies.

Investigations are opened in accordance with priorities set forth in the OIG Strategic Plan for 2019–2023 and in consideration of prosecutorial guidelines established by local U.S. Attorneys. OIG investigations are governed by the *Attorney General Guidelines for Offices of Inspector General with Statutory Law Enforcement Authority* and by the *CIGIE Quality Standards for Investigations*, as well as federal statutes and regulations.

Investigative efforts often lead to criminal convictions and civil and administrative remedies. Investigations are initiated as a result of allegations or referrals from private citizens; audits and evaluations; EPA and CSB employees; Congress; other federal, state, local, and tribal law enforcement agencies; and proactive efforts directed at areas bearing a high potential for fraud, waste, and abuse.

This annual investigative plan was developed to focus our OIG investigative priorities on more fraud cases, and ensure our resources are used in the most effective and efficient manner. The plan provides strategies and planned investigative work for FY 2020 in conjunction with the OIG Strategic Plan. The most serious management and performance challenges facing the EPA and the CSB were also considered in developing this plan.

Point of Contact: Helina Wong, Assistant Inspector General for Investigations, (202) 566-2841

The following strategic measures will include what the OI will be working toward in FY 2020 and beyond:

Strategic Measure #	Strategic Measure Description
1.2.1	By September 30, 2023, the OIG will be able to show quantitative measures supporting the OIG's contribution to the reduction or elimination of environmental risks and challenges by conducting audits, evaluations, or investigations. We will conduct at least one audit, evaluation, or investigation addressing an emerging environmental risk or challenge.
2.1.1	By September 30, 2023, the OIG will have conducted investigations geared toward protecting the integrity of programs and operations addressing the EPA's six priority goals.
2.1.2	By September 30, 2023, the OIG will have conducted investigations for the prevention of cyber- related attacks. These investigations will result in increased protective measures codified in policy and procedure.
2.4.1	By September 30, 2023, the OIG will have increased its capacity for case management of investigations involving mismanagement and misconduct that result in fraud, waste, or abuse.
2.4.3	By September 30, 2023, the OIG will increase its return on investment to a minimum ratio of 12 to 1 as an average across the five years from 2019 to 2023.
3.3.2	By September 30, 2023, the OIG's Federal Employee Viewpoint Survey scores in at least three of the five Office of Personnel Management embedded indexes (Employee Engagement, Global Satisfaction, Effective Communications, New Inclusion Quotient, and Human Capital Assessment and Accountability Framework) and will increase by at least 10 percent from each index's 2018 average.
3.3.3	By September 30, 2023, due to various programs that we put into place, the OIG will work to increase its "Best Places to Work" score for an Agency subcomponent (as administered by the Partnership for Public Service) by at least one quartile from FY 2018 levels.

Pending Investigative Activities

The OI plays a critical oversight role helping to ensure that the EPA and the CSB funds are properly expended and not subject to fraud, waste, or abuse. Pending cases as of September 30, 2019, totaled 142 cases, as shown in Figure 1. It provides a summary of OIG ongoing investigative activities by case category as of September 30, 2019. Of the 142 open investigations, 75, or 53 percent, are fraud-related; and 42 cases, or 30 percent, involve employee misconduct.

Pending Cases as of September 30, 2019 (142 Total) 4.2% 3.5% Employee Misconduct 3 5% Contract Fraud Grant Fraud 29.6% 9.9% Program Fraud 10.6% *Other Computer Crime 18.3% 20.4% Threat

Figure 1: Ongoing OIG investigation activities

Source: The OIG OI.

Lab Fraud

The following section provides the actions the OI will be taking to achieve each of the OIG Strategic Goals.

Goal 1: Contribute to improved EPA and CSB programs and operations that protect human health and the environment and enhancing safety.

The OI will conduct investigations into allegations of fraud and other crimes involving EPA grants and contracts that assist state, local, and tribal governments; universities; and nonprofit recipients. The following are our FY 2020 priorities:

- Financial fraud (grants and contracts). These investigations may involve multiple agencies and focus on criminal activities related to Agency grants, state revolving funds, interagency agreements, and assistance agreements that provide financial support to state, local, and tribal governments; universities; and nonprofit recipients. Collectively, these programs account for about half of the EPA's budget. These investigations also focus on acquisition management, contracts, and procurements. The OI specifically focuses on mischarging, defective pricing, defective products, kickbacks, and collusion.
- **Program fraud.** These investigations focus on activities that could undermine the integrity of Agency programs involving public health and safety and erode the public trust in the EPA and its employees. These cases involve serious misconduct or criminal activity that relies on, takes advantage of, or exploits systematic weaknesses or vulnerabilities of the Agency for personal gain. This can include individuals misrepresenting themselves as EPA employees in a scheme or attempt to defraud, or the fraudulent use of EPA seals, certifications, letterhead, or logos.
- Laboratory fraud. These investigations deal with contract laboratory fraud relating to water quality and superfund data, as well as payments made by the EPA for erroneous

^{*}The "other" category covers investigations such as Falsifying Official Documents/Forgery, Misuse of Government Property (by non-employee), and Destruction of Government Property (by non-employee).

environmental testing data. Such activities could undermine the basis for EPA decision making, regulatory compliance, and enforcement actions.

• Computer intrusion. These investigations involve attacks against the EPA's computer and network systems; suspicious behavior regarding EPA computer data; spear phishing; and the protection of critical data, resources, infrastructure, and intellectual property.

Goal 2: Conduct audits and investigations that enable the EPA and the CSB to improve business practices and accountability.

The OI's investigations of employee misconduct help the OIG improve operations at the EPA and the CSB. The following are our FY 2020 priorities:

- Employee integrity and alleged criminal conduct or serious administrative misconduct. These investigations involve allegations made against EPA and CSB employees involving matters that could threaten the credibility of the Agency and the integrity of its resources. To communicate and coordinate on employee misconduct cases, the OI participates in biweekly meetings with the EPA's Office of General Counsel and the Office of Mission Support.
- Travel and purchase card fraud. These investigations include improper, abusive, or questionable transactions using government travel and purchase cards. The OI coordinates with the EPA's Office of the Chief Financial Officer to investigate instances of abuse involving individual travel cards issued to Agency employees as well as purchase cards issued for the procurement of supplies and equipment.
- Small Business Innovative Research program fraud. The National Defense Authorization Act for FY 2012 requires OIGs to report on reducing fraud, waste, and abuse in the Small Business Innovative Research program. The OI investigates allegations of fraud against EPA Small Business Innovative Research contracts awarded to recipients.
- **Disaster relief spending oversight.** The OI participates in investigations that involve examining disaster relief spending for fraud, waste, and abuse. After a disaster, the EPA assists the affected area to make it is safe for human habitation. This assistance may be through grants and contracts from the EPA for safe drinking water, sewer treatment facilities, and debris removal.

Goal 3: Improve OIG processes, resource allocation, and accountability to meet stakeholder needs.

The OI considers its workforce as its most important and valued resource. We will continue to recruit, develop, and retain a well-qualified diverse workforce with the ability to meet twenty-first century challenges. Additionally, we will enhance the use of technology to conduct our business in a more effective and efficient manner. Our FY 2020 priorities are:

• Workforce professional development. The OI will recruit, develop, and retain a diverse, dedicated workforce to fulfill critical mission requirements. The OI will provide

training opportunities to our staff so they are better equipped to investigate matters involving emerging criminal trends and fraud schemes.

- **Proactive initiative.** The OI will work collaboratively with the OIG Data Analytics team to identify potential investigative leads through data mining contract and grant databases using known fraud indicators. The OI will continue to look for opportunities to use data analytics tools and methodologies to improve the overall efficiency and effectiveness in the way it conducts investigations.
- Computer forensics. The OI continues to build a robust forensic lab and expand on its digital forensic capabilities while improving its processes and procedures to effectively identify and collect electronically stored information from various forms of media and networks as well as the cloud and social media websites. The OI provides the OIG Special Agents and OA&E with an enhanced review capability of electronic data through the use of forensic software.

The Plan: Office of Counsel and Congressional and Public Affairs FY 2020 Focus

The OIG's OCCPA provides support to audits, evaluations, investigations, and management services. The OCCPA provides legal, editing, and communication services, as described in more detail below, which support the OIG in achieving Strategic Goal 1 to contribute to improved EPA and CSB programs and operations protecting human health and the environment, and enhancing safety. Further, the OCCPA's support services advance the OIG's Strategic Goal 2, which is to enable the EPA and the CSB to improve business practices and accountability. Finally, the OCCPA embraces Strategic Goal 3 objectives so that our services are timely, efficient, and supported by a high-performing professional staff.

Point of Contact: Eric Hanger, Deputy Counsel to the Inspector General, (202) 566-0866

The OCCPA provides support to the OIG's overall achievements of the three strategic goals and the objectives established for each component office (see Appendices A and B for a complete list of OIG's goals, objectives, and strategic measures). In FY 2020, OCCPA activities also will specifically support the following strategic measures.

Strategic Measure #	Strategic Measure Description
1.2.3	By September 30, 2023, the OIG will have refined its performance metrics to better align with mission objectives, improve our ability to "tell the OIG story" of our influence, and impact on our contribution to the elimination of environmental risks and challenges, and confirm that we maintain relevance with current goals and objectives.
3.1.1	By September 30, 2023, the OIG will implement new timeliness measures and goals on products and services provided to our stakeholders and to the Agency.
3.2.2	By September 30, 2023, the OIG will have implemented an enterprise risk management system whose governance and cycle of accountability will increase our organization's effectiveness.
3.2.3	By September 30, 2023, the OIG will identify high-risk and high-vulnerability OIG activities, implement appropriate review for activities that are considered high-risk, and minimize them to an appropriate degree. The OIG will implement at least one mitigation plan.
3.3.1	By September 30, 2023, the OIG will match or improve on federal government retention rates and will continue to develop programs to attract and retain high-talent staff.
3.3.2	By September 30, 2023, the OIG's Federal Employee Viewpoint Survey scores in at least three of the five Office of Personnel Management embedded indexes (Employee Engagement, Global Satisfaction, Effective Communications, New Inclusion Quotient, and Human Capital Assessment and Accountability Framework) and will increase by at least 10 percent from each index's 2018 average.

Strategic Measure #	Strategic Measure Description
3.3.3	By September 30, 2023, due to various programs that we put into place, the OIG will work to increase its "Best Places to Work" score for an Agency subcomponent (as administered by the Partnership for Public Service) by at least one quartile from FY 2018 levels.

FY 2020 OCCPA Annual Plan

Office of Congressional and Public Affairs

Within the OCCPA, the OCPA is charged with supporting the OIG's Strategic Measure 1.2.3 to "tell the OIG story" of our influence and impact toward mitigating environmental risks and challenges, promoting efficiency, and making progress toward established OIG goals and objectives. This mission supports the OIG's priority to "execute a clear messaging strategy geared toward increased visibility in support of ensuring the free-flow of information from the public that would assist in rooting out fraud, waste, and abuse in environmental and health and human services programs and associated initiatives."

The OCPA also has primary responsibility for addressing a second OIG priority: "Continue to be responsive to congressional inquiries and actively assess and address hotline complaints."

The OCPA communicates with Congress, the news media, and the general public about the OIG's work. In FY 2019, the OCPA received about 269 congressional and 250 media inquiries, and 15 congressional requests for the OIG to conduct audits and investigations on specific topics. The OCPA staff also actively pursue outreach meetings with journalists who cover the EPA in order to introduce the OIG's mission, and to learn more about the needs and interests of media outlets. Further, the OCPA staff regularly research and respond to questions about the OIG's work from individuals and stakeholder groups.

In addition, the OCPA edits, publishes online, and disseminates OIG reports and correspondence. The office's writer-editors provide quality assurance by working closely with auditors, evaluators, and investigators to ensure that OIG products are thorough, clear, and adhere to established writing standards. In FY 2020, the OCPA looks forward to providing communication support to the OIG's OA&E as it expands its program to include targeted evaluation work. Anyone who is interested in keeping abreast of the OIG's public reports and correspondence may subscribe via the OIG's website to receive email updates that provide timely notifications of postings. This service includes "coming soon" messages that provide advance notice of reports scheduled for issuance. Illustrative of the OCPA's work toward achieving the OIG strategic goals, these efforts contribute to the OIG's achievement of Objective 1.2 by improving the OIG's ability to communicate with Congress, the news media, and the public about OA&E project results that contribute to identifying, reducing, and eliminating environmental risks and challenges.

Along with the public website, the OCPA is responsible for managing the OIG's social media platforms. Through the <u>OIG's Twitter account</u>, the OCPA connects with thousands of followers about

recently published reports, available resources, planned events, and oversight topics. Moreover, the OCPA creates multimedia products to enhance and amplify the OIG's audit and investigative work for public consumption, a portfolio that will expand to include evaluation work in FY 2020. A YouTube channel serves as a platform for videos created by the OIG, which include standalone products or clickable features within reports. Graphics and photographs are used on the covers and within the reports, as well as embedded in tweets. Podcasts illuminate select audit and evaluation reports and complex investigative subjects.

Closely tied to the OIG's objectives under Strategic Goal 2, protecting the integrity of programs and operations reducing risk of loss through prevention of fraud, waste, abuse, and mismanagement, the OCPA manages the OIG Hotline. In FY 2019, the hotline received nearly 400 complaints. The OCPA promptly processes this information; refers issues for audits, evaluations, or investigations, when warranted; and refers issues to the appropriate office or Agency if not within the OIG's jurisdiction. The OIG encourages the submission of suggestions to the hotline for assessing the efficiency and effectiveness of Agency programs, along with complaints of fraud, waste, abuse, misconduct, and mismanagement in the EPA programs and operations, as well as violations of law, regulations, and policies by EPA and CSB employees, grantees, contractors, and program participants.

The OCPA also is responsible for operating the OIG's main phone line and email inbox, which directs anyone who contacts the OIG to the right place.

Office of Counsel

The OC within the OCCPA provides independent legal and policy advice to all components of the OIG, covering a variety of substantive and procedural matters relating to the OIG's audits, evaluations, investigations, and other activities. The OC supports the OIG activities that implement OIG strategic goals and objectives. The OC provides legal support to the OI's Strategic Goal 2 activities, protecting the integrity of program and operations through criminal and administrative investigations. Further, the OC reviews the OIG reports to ensure their legal sufficiency in support of the OIG's strategic objectives to influence actions and change that contribute to improved human health, safety, and environmental quality. The OC's activities also include legal reviews as deemed necessary by the Inspector General in response to requests by members of Congress, the EPA or the CSB, and the public.

OIG employees are expected to maintain high ethical standards and adhere to applicable federal ethics laws. To support this vital function, the OC manages the OIG ethics program, including ensuring that OIG staff complete ethics training each year, reviewing financial disclosure reviews submitted by OIG employees designated to file these forms, and responding to any questions from OIG employees who may seek advice involving ethics.

The OC also coordinates and processes the OIG's responses to the Freedom of Information Act, Privacy Act of 1974, and other legal requests or demands for OIG documents. The Freedom of Information Act provides authority for the public to obtain access to federal Agency records, except to the extent that such records are protected from public disclosure by one of nine exemptions. The Privacy Act mandates how federal agencies maintain records about individuals. The law strives to balance the government's needs to maintain these records with the individual's

right to be protected from unwarranted invasions of personal privacy. In recent years, the OIG has received increasing numbers of Freedom of Information Act requests, topping 130 in FY 2018 and 113 requests for FY 2019.

The OC also houses the OIG Whistleblower Protection Coordinator. The Whistleblower Protection Enhancement Act of 2012 and the Whistleblower Protection Coordination Act of 2018 amended the Inspector General Act to require Inspectors General to designate a Whistleblower Protection Coordinator. The EPA OIG Whistleblower Protection Coordinator is available to educate Agency employees (as well as employees of EPA contractors, subcontractors, grantees, subgrantees, or personal services contractors) who have made, or are contemplating making, a protected disclosure about rights and remedies against retaliation for protected disclosures—including the means by which employees may seek review of any allegation of reprisal, and the roles of the OIG, the Office of Special Counsel, the Merit Systems Protection Board, and other relevant entities. Further, the EPA OIG Whistleblower Protection Coordinator assists the Inspector General in promoting the timely and appropriate handling and consideration of protected disclosures and allegations of reprisal. The EPA OIG Whistleblower Protection Coordinator cannot act as a legal representative, agent, or advocate of an employee or former employee. The EPA OIG's Whistleblower Protection Coordinator can be contacted at whistleblower protection@epa.gov or by phone at (202) 566-1513. More information can be found on the OIG's website.

The Plan: Office of Management FY 2020 Focus

The OM serves as the corporate focal point for the Immediate Office of the Inspector General and is responsible for promoting the most efficient use and accountability of OIG resources, and helps the OIG effectively achieve its mission and goals. The OM has three directorates that form the cornerstone of the OIG's management services:

- Business Analysis and Results Directorate. Provides budget planning, formulation, execution, analysis, and reporting support; acquisition liaison and management; strategic and operational planning, policy, and procedure management; performance management and reporting; internal reviews; GAO liaison activities; and management and oversight of the OIG enterprise risk management program.
- *Human Resources Directorate*. Provides operational support for activities such as recruitment, staffing, classification, retirement, and benefits liaison activities; employee training and professional development; performance management; employee relations; workforce planning; executive resources; and facilities and space management.
- Information Technology Directorate. Provides the OIG with a range of products and services in the areas of software development, data analysis, and survey support; infrastructure and technical support services; information security; and records and property management. Additionally, the directorate performs all Information Management Officer functions including, but not limited to, overseeing IT purchases and acquisitions as well as providing mobile device support.

The matrix of the OIG OM Plan is a compilation of the goals and measurements captured in the OIG Strategic Plan and the IT Strategic Plan. The OM plan maintains alignment with the EPA's and the CSB's respective missions and new strategic goals, along with the OIG's unique duties, roles, authorities, and responsibilities as defined by the Inspector General Act; and the OIG's specific management values and vision for inspiring the greatest level of OIG success in performing our mission. These goals and objectives reflect our responsibility to detect and prevent fraud, waste, abuse, mismanagement, and misconduct in the EPA's and the CSB's programs and operations. The OIG Strategic Plan provides a unified direction with clear expectations.

The matrix of the OIG OM Plan charts the course of the OM and outlines how we will service our customers' human resource needs, provide tools and technologies to support collaboration, and provide fiscally sound budget advice. The following are OM's priorities for FY 2020:

- Maximize the customer experience by providing results-oriented IT solutions.
- Optimize tools and technology to foster collaboration among stakeholders.
- Continuously improve delivery of OIG systems and services.
- Recruit, develop, and retain a high-quality workforce.
- Implement the internal review of OIG practices and programs.

- Establish the OIG's enterprise risk management governance.
- Expand data analytics capability.

Point of Contact: Stephanie L. Wright, Acting Deputy Assistant Inspector General for Management, (202)-566-2698

The matrix of the OIG OM Plan communicates our vision, mission, and future direction to our customers and team members so that we can reinforce and expand collaborative efforts to accomplish our three goals. The following are the strategic measures the OM will endeavor to progress toward in FY 2020:

Strategic Measure #	Strategic Measure Description
1.2.3	By September 30, 2023, the OIG will have refined its performance metrics to better align with mission objectives, improve our ability to "tell the OIG story" of our influence and impact on our contribution to the elimination of environmental risks and challenges, and confirm that we maintain relevance with current goals and objectives.
3.2.1	By September 30, 2023, the OIG will implement at least ten best practices across the OIG, aimed at increasing our efficiency in our human resources, IT, and budgetary missions.
3.2.2	By September 30, 2023, the OIG will have implemented an enterprise risk management system whose governance and cycle of accountability will increase our organization's effectiveness.
3.2.3	By September 30, 2023, the OIG will identify high-risk and high-vulnerability OIG activities, implement appropriate review for activities that are considered high-risk, and minimize them to an appropriate degree. The OIG will implement at least one mitigation plan.
3.3.1	By September 30, 2023, the OIG will match or improve on federal government retention rates and will continue to develop programs to attract and retain high-talent staff.
3.3.2	By September 30, 2023, the OIG's Federal Employee Viewpoint Survey scores in at least three of the five Office of Personnel Management embedded indexes (Employee Engagement, Global Satisfaction, Effective Communications, New Inclusion Quotient, and Human Capital Assessment and Accountability Framework) and will increase by at least 10 percent from each index's 2018 average.
3.3.3	By September 30, 2023, due to various programs that we put into place, the OIG will work to increase its "Best Places to Work" score for an Agency subcomponent (as administered by the Partnership for Public Service) by at least one quartile from FY 2018 levels.

The following are OM's specific plans for FY 2020 matrixed to goals of both the OIG IT Strategic Plan as well as the OIG Strategic Plan FY 2019–2023:

	OIG IT Strategic Plan FY2018–2021		OIG Strategic Plan 2019-2023				
Planned FY 2020 OM Projects	Maximize the customer experience by providing results-oriented IT solutions	to foster collaboration among	improve delivery of	Contribute to improved EPA and CSB programs and operations protecting human health and the environment, and enhancing safety	investigations that enable the EPA and the CSB to improve business	Improve OIG processes, resource allocation, and accountability to meet stakeholder needs	Project time frame
Information Technology Directorate							
IGEMS ColdFusion 2016 upgrade	Y	Y	Y			Y	Complete in FY 2020
Move Primary Data Center to Research Triangle Park	Y	Υ	Y			Y	Complete in FY 2020
Move disaster recovery site to Region 8 in support of COOP initiatives	Y	Υ	Υ			Y	Complete in FY 2021
Windows Server 2008 end of life software upgrade initiative	Y	Υ	Υ			Y	Complete in FY 2020
Data back-up storage system upgrade project	Υ	Υ	Υ			Y	Complete in FY 2020
Continuous monitoring assessments			Υ			Υ	Ongoing
Business Analysis and Results Directorate							
Establish OM Internal Review Program						Y	Initiated in FY 2019, then ongoing
Conduct Internal Review of the OIG time and attendance procedures						Υ	Complete in FY 2020
Conduct Internal Review of the OIG Employee Wellness Program						Y	Complete in FY 2020
Establish governance for enterprise risk management						Υ	Complete in FY 2020
Restructure OIG Performance Management and Analysis Program 1						Υ	Complete in FY 2020
Execute FY 2019 Carryover Management						Υ	Complete in FY 2020
Manage OIG FY 2020 Operations Plan						Y	Ongoing
Complete FY 2021 Congressional Justification						Y	Complete in FY 2020
Establish FY 2022 OIG Budget Planning						Y	Complete in FY 2020
Human Resources Directorate							
Develop and Implement FY 2020 Recruitment Strategy						Y	Complete in FY 2020
Establish new performance management system						Y	Complete in FY 2020
Implement OM continuous improvement initiatives						Y	Initiate in FY 2020, then ongoing.
Reduce OIG HQ footprint pursuant to the FY 2020 EPA Space Consolidation						Y	Complete in FY 2020

Appendix A: Overview of the OIG Strategic Plan 2019-2023

VISION

Be the premier oversight organization trusted to speak the truth, promote good governance, and contribute to improved human health and the environment.

MISSION

Conduct independent audits, evaluations, and investigations; make evidence based recommendations to promote economy, efficiency, and effectiveness; and prevent and detect fraud, waste, abuse, mismanagement, and misconduct for the EPA and the CSB.

GOALS

Contribute to improved EPA and CSB programs and operations protecting human health and the environment, and enhancing safety.

Conduct audits, evaluations, and investigations that enable the EPA and the CSB to improve business practices and accountability.

Improve OIG processes, resource allocation, and accountability to meet stakeholder needs.

OBJECTIVES

- Influence actions and change that contribute to improved human health, safety, and environmental quality.
- Produce results that contribute to the identification, reduction, or elimination of environmental risks and challenges.
- Protect the integrity of programs and operations through criminal, civil, and administrative investigations.
- Influence actions and identify best practices to improve efficiency and accountability, and achieve monetary benefits.
- Reduce risk of loss by detecting and achieving monetary benefits.
- Reduce risk of loss by detecting and preventing fraud, waste, abuse, mismanagement, and misconduct.

- Ensure that our products and services are timely, responsive, and relevant, and maximize protection of human health and the environment and return on investment.
- Ensure that our processes and actions are efficient and effective through continuous improvement.
- Recruit, develop, and retain an innovative, high performing and diverse workforce that is valued, appreciated, and respected.
- Enhance constructive relationships and foster collaborative solutions.

Core Value: Be the best in public service

Customer Service

Integrity

Accountability

Appendix B: OIG Strategic Measures 2019–2023

Objective 1.1: Influence actions and change that contribute to improved human health, safety, and environmental quality.

Strategic Measure 1.1.1—By September 30, 2023, the OIG will have conducted audits and evaluations resulting in recommendations in specific areas geared toward improvement in EPA policies, procedures, and practices contributing to improved human health, safety, or environmental quality in each of its major offices and sub-offices. Further, the OIG will continue to work with the Agency to track implementation of OIG recommendations.

Objective 1.2: Produce results that contribute to the identification, reduction, or elimination of environmental risks and challenges.

<u>Strategic Measure 1.2.1</u>—By September 30, 2023, the OIG will be able to show quantitative measures supporting the OIG's contribution to the reduction or elimination of environmental risks and challenges by conducting audits, evaluations, or investigations. We will conduct at least one audit, evaluation, or investigation addressing an emerging environmental risk or challenge.

Strategic Measure 1.2.2—By September 30, 2023, the OIG will have contributed to the reduction and elimination of environmental risks and challenges by conducting at least one audit or evaluation in each of the EPA's six priority goal areas rendering impactful recommendations.

Strategic Measure 1.2.3—By September 30, 2023, the OIG will have refined its performance metrics to better align with mission objectives, improve our ability to "tell the OIG story" of our influence and impact on our contribution to the elimination of environmental risks and challenges, and confirm that we maintain relevance with current goals and objectives.

Objective 2.1: Protect the integrity of programs and operations through criminal, civil, and administrative investigations.

<u>Strategic Measure 2.1.1</u>—By September 30, 2023, the OIG will have conducted investigations geared toward protecting the integrity of programs and operations within the EPA's six priority goals.

Strategic Measure 2.1.2—By September 30, 2023, the OIG will have conducted investigations for the prevention of cyber-related attacks. These investigations will result in increased protective measures codified in policy and procedure.

Objective 2.2: Influence actions and identify best practices to improve efficiency and accountability and achieve monetary benefits.

Strategic Measure 2.2.1—By September 30, 2023, the OIG will perform audits and evaluations in each EPA priority area, resulting in documented, data-supported improvements in efficiency and accountability across the Agency.

Objective 2.3: Reduce risk of loss by detecting monetary benefits.

<u>Strategic Measure 2.3.1</u>—By September 30, 2023, the OIG will have reduced risk of loss by detecting monetary benefits through audits and evaluations targeting initiatives within the EPA's six priority goals.

Objective 2.4: Reduce risk of loss by detecting and preventing fraud, waste, abuse, mismanagement, and misconduct.

Strategic Measure 2.4.1—By September 30, 2023, the OIG will have increased its capacity for case management of investigations involving mismanagement and misconduct that result in fraud, waste, or abuse.

<u>Strategic Measure 2.4.2</u>—By September 30, 2023, the OIG will have increased the effectiveness of audits and evaluations using quantifiable impact in implemented recommendations as our measure.

<u>Strategic Measure 2.4.3</u>—By September 30, 2023, the OIG will increase its return on investment to a minimum ratio of 12 to 1 as an average from 2019 to 2023.

Objective 3.1: Ensure that our products and services are timely, responsive, and relevant, and maximize protection of human health and the environment and return on investment.

<u>Strategic Measure 3.1.1</u>—By September 30, 2023, the OIG will implement new timeliness measures and goals on products and services provided to our stakeholders and to the Agency.

Objective 3.2: Ensure that our processes and actions are efficient and effective through continuous improvement.

<u>Strategic Measure 3.2.1</u>—By September 30, 2023, the OIG will implement at least ten best practices across the OIG, aimed at increasing our efficiency in our human resources, IT, and budgetary missions.

<u>Strategic Measure 3.2.2</u>—By September 30, 2023, the OIG will have implemented an enterprise risk management system whose governance and cycle of accountability will increase our organization's effectiveness.

<u>Strategic Measure 3.2.3</u>—By September 30, 2023, the OIG will identify high-risk and high-vulnerability OIG activities, implement appropriate review for activities that are considered high risk, and minimize them to an appropriate degree. The OIG will implement at least one mitigation plan.

Objective 3.3: Recruit, develop, and retain an innovative, high-performing, and diverse workforce that is valued, appreciated, and respected.

<u>Strategic Measure 3.3.1</u>—By September 30, 2023, the OIG will match or improve on federal government retention rates and will continue to develop programs to attract and retain high-talent staff.

<u>Strategic Measure 3.3.2</u>—By September 30, 2023, the OIG's Federal Employee Viewpoint Survey scores in at least three of the five Office of Personnel Management embedded indexes (Employee Engagement, Global Satisfaction, Effective Communications, New Inclusion Quotient, and Human Capital Assessment and Accountability Framework) and will increase by at least 10 percent from each index's 2018 average.

<u>Strategic Measure 3.3.3</u>—By September 30, 2023, due to various programs that we put into place, the OIG will increase its "Best Places to Work" score for an Agency subcomponent (as administered by the Partnership for Public Service) by at least one quartile from FY 2018 levels.

Objective 3.4: Enhance constructive relationships and foster collaborative solutions.

Strategic Measure 3.4.1—By September 30, 2023, the OIG will be a recognized and active participant in leader forums with sister agencies and with stakeholders as appropriate (e.g., interactions with the Office of Management and Budget, the Office of Personnel Management, the EPA's Criminal Investigative Division, and CIGIE).