



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

THE INSPECTOR GENERAL

November 19, 2020

**MEMORANDUM**

**SUBJECT:** Response to Planned Corrective Actions for Office of Inspector General  
Report No. 18-P-0239, *EPA Asserts Statutory Law Enforcement Authority to Protect Its Administrator but Lacks Procedures to Assess Threats and Identify the Proper Level of Protection*, issued September 4, 2018

**FROM:** Sean W. O'Donnell 

**TO:** Susan Parker Bodine, Assistant Administrator  
Office of Enforcement and Compliance Assurance

David A. Bloom, Deputy Chief Financial Officer

David Fotouhi, Acting General Counsel

Thank you for your memorandum dated October 14, 2020, which provided the U.S. Environmental Protection Agency's planned corrective actions and estimated completion dates for Recommendation 6 of the subject report. The report's other 11 recommendations were previously resolved.

Recommendation 6 stated that the Office of Enforcement and Compliance Assurance, or OECA, should require the Office of Criminal Enforcement, Forensics, and Training to "determine the amount of overtime that was improperly authorized for Protective Service Detail agents in calendar years 2016 and 2017 and identify the amounts paid as improper payments." In the report, we estimated those amounts to be just over \$106,500. In March 2020, OECA agreed that the amounts paid met the definition of an improper payment, as defined by the Office of Management and Budget's Circular A-123, Appendix C, *Requirements for Payment Integrity Improvement*. Further, OECA informed us that it analyzed the overtime paid to Protective Service Detail agents and identified just over \$54,000 as improperly authorized. In May 2020, we informed OECA that its analysis was incorrectly based on overtime approved rather than the advanced authorization of overtime. OECA agreed to correct its analysis; however, to perform these corrections, OECA required hard copy records located in its offices, which it could not access because of restrictions related to the coronavirus pandemic. OECA estimated that it could correct its analysis by September 2020.

OECA completed its corrections and determined, based on requests for overtime authorization, that the amount of overtime improperly authorized for Protective Service Detail agents in calendar years 2016 and 2017 was \$96,866.17. This \$96,866.17 amount will be included in the 2020 Agency Financial Report, which will be issued on November 15, 2020.

Based on OECA's corrected analysis, we consider Recommendation 6 resolved.

If you or your staff have any questions, please contact Katherine Trimble, assistant inspector general for Audit, at (202) 566-2914 or [trimble.katherine@epa.gov](mailto:trimble.katherine@epa.gov), or John Trefry, director of Forensic Audits, at (202) 566-2474 or [trefry.john@epa.gov](mailto:trefry.john@epa.gov).

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

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