



OFFICE OF INSPECTOR GENERAL

Semiannual Report to Congress

April 1, 2020–September 30, 2020

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November 2020

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Inspector General Act of 1978, as amended

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Abbreviations

BEACH Act	Beaches Environmental Assessment and Coastal Health Act of 2000
CARES Act	Coronavirus Aid, Relief, and Economic Security Act
CSB	U.S. Chemical Safety and Hazard Investigation Board
EPA	U.S. Environmental Protection Agency
FY	Fiscal Year
OIG	Office of Inspector General
SES	Senior Executive Service
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)
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1200 Pennsylvania Avenue, NW (2410T)
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 (202) 566-2391
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Message to Congress

As the one-year mark of my tenure approaches, I want to express how honored I am to serve as the inspector general for the U.S. Environmental Protection Agency and the U.S. Chemical Safety and Hazard Investigation Board. Our work environment has changed since I took the helm in January 2020, but our continued productivity and oversight accomplishments are evidenced in this *Semiannual Report to Congress*. Although some of the work was initiated before the coronavirus pandemic, much of it was conducted and completed while our entire staff was teleworking and simultaneously managing health and safety concerns. In the face of these challenges, we remained focused on our critical mission to fight waste, fraud, and abuse related to the programs and operations of the EPA and the CSB, as well as promote economy, efficiency, and effectiveness in those programs and operations.



Sean W. O'Donnell

During this reporting period, the OIG addressed the impact of the coronavirus pandemic on the EPA's operations, established management challenges for the EPA and the CSB, reorganized several of our internal offices, and examined the EPA's Scientific Integrity Policy.

Coronavirus Pandemic. The OIG has initiated audits, evaluations, and investigations to examine how the EPA and the CSB have managed their programs and operations during the pandemic. In this semiannual reporting period, we issued two reports regarding the EPA's pandemic response, as well as a summary report describing the pandemic-related topics that we are or likely will be examining and a report identifying the top pandemic-related challenges facing the Agency. In addition, the OIG has investigated potential misconduct and criminal activity related to the pandemic, such as fraudulent claims regarding the Agency's approval or endorsement of commercial products' effectiveness against the virus.

EPA and CSB Management Challenges. The OIG is required by statute to prepare a report annually identifying the top management challenges for the EPA and the CSB. To identify these challenges, we examined our body of audit and evaluation work for systemic issues. We also considered information provided by the EPA and CSB to the OIG and the U.S. Government Accountability Office, as well as public statements the Agencies made to the press and Congress. As a result of our analyses, we identified eight top management challenges for the EPA, including maintaining operations during pandemics and natural disasters, communicating risks, and integrating and leading environmental justice, and three management challenges for the CSB.

These top management challenges are not intended to be static or focused only on the past. They are dynamic and forward-looking. In line with our overall mission, these top management challenges will thus frame most ongoing and future projects to help the EPA and the CSB address these challenges.

OIG Reorganization. In June 2020, the OIG's Office of Investigations created two field offices within its Field Operations Directorate—the Eastern Region Field Office, comprising subordinate offices in EPA Regions 1 through 5, and the Western Region Field Office, comprising subordinate offices in EPA Regions 6 through 10. The realignment is intended to enhance communication and efficiency and improve the manager-to-staff ratio.

In August 2020, the Office of Audit and Evaluation returned to two separate offices—the Office of Audit and the Office of Evaluation. This reorganization allows the OIG to focus on the specific quality standards required to meet project goals, create internal efficiencies to support a timely response to requests from Congress and the public, and provide timely reports to the Agencies.

Also, in August, the OIG brought together its strategic planning, congressional and public affairs, and data analytics functions to create an Office of the Chief of Staff.

Scientific Integrity. This semiannual report includes a new section on scientific integrity. We thought it was important to raise attention to these issues on the heels of OIG Report No. [20-P-0173](#), *Further Efforts Needed to Uphold Scientific Integrity Policy at EPA*, which examined whether the Policy was being implemented as intended throughout the EPA. This section reports on the status of scientific integrity allegations and inquiries received by the Agency’s scientific integrity official and the OIG during this reporting period. It also points to trends in the number and types of issues as well as any challenges to resolving allegations. Highlighting these significant issues will help to maintain and strengthen scientific integrity at the EPA.

Impact of OIG’s work. The findings and recommendations we make in our audits and evaluations are intended to enhance the EPA’s and the CSB’s efforts in meeting their respective environmental, human health, and safety missions; improving program efficiencies; and reducing costs and risks. Some of our reports continue to have an impact long after they have been issued. For example, the U.S. District Court for the Eastern District of Michigan’s decision in *Walters vs. Flint*, issued on August 26, 2020, cited findings from OIG Report No. [17-P-0004](#), *Management Alert: Drinking Water Contamination in Flint, Michigan, Demonstrates a Need to Clarify EPA Authority to Issue Emergency Orders to Protect the Public*, issued on October 20, 2016. The decision recognized that our report made clear that the EPA did not take appropriate action after discovering that the City of Flint violated several federal drinking water standards and that EPA Region 5 had enough information to issue an emergency order to protect the city’s residents from lead-contaminated water as early as June 2015.

OIG accomplishments for fiscal year 2020

- **Questioned costs and potential monetary benefits** (includes results from single audits): \$63.6 million
- **Total fines and recoveries** (includes EPA-only and joint investigations): \$.75 million
- **Reports issued:** 57 reports
- **Investigative cases closed:** 129 cases
- **Administrative actions resulting from investigative cases:** 44 actions
- **Hotline inquiries referred for action:** 433 inquiries

Also, at the beginning of the 2020 hurricane season, the EPA issued a news release that reminded facility owners they are obligated to minimize chemical releases and to report chemical or oil releases and discharges in a timely manner and as required by law. This action directly reflects the

recommendations in OIG Report No. [20-P-0062](#), *EPA Needs to Improve Its Emergency Planning to Better Address Air Quality Concerns During Future Disasters*, issued on December 16, 2019, which recommended that the Agency develop a plan to inform communities near industrial areas of health risks and limit exposure to air toxics.

Sean W. O'Donnell
Inspector General

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About EPA and Its Office of Inspector General

U.S. Environmental Protection Agency

The mission of the U.S. Environmental Protection Agency is to protect human health and the environment. As America’s steward for the environment since 1970, the EPA has endeavored to ensure that the public has air that is safe to breathe, water that is clean and safe to drink, food that is free from dangerous pesticide residues, and communities that are protected from toxic chemicals.

EPA Office of Inspector General

The Office of Inspector General, established by the Inspector General Act of 1978, as amended, 5 U.S.C. app., is an independent office of the EPA that detects and prevents fraud, waste, and abuse to help the Agency protect human health and the environment more efficiently and effectively. OIG staff are located at EPA headquarters in Washington, D.C.; the EPA’s ten regional offices; Research Triangle Park, North Carolina; and Cincinnati, Ohio. The EPA inspector general also serves as the inspector general for the U.S. Chemical Safety and Hazard Investigation Board. Our vision, mission, and goals are as follows:

Vision

Be a 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

1. Contribute to improved EPA and CSB programs and operations protecting human health and the environment and enhancing safety.
2. Conduct audits, evaluations, and investigations that enable the EPA and the CSB to improve business practices and accountability.
3. Improve OIG processes, resource allocation, and accountability to meet stakeholder needs.

Scoreboard of Results


The information below shows return on investment to the taxpayer for work performed by the EPA OIG during fiscal year 2020 compared to FY 2020 annual performance goal targets. All results reported are based on goals and plans established under the Government Performance and Results Act.

Annual Performance Goal 1: Environmental and business outcome actions taken; changes, corrections, or improvements made; and risks reduced, eliminated, or influenced by OIG work	
Target: 196 Reported: 127 (65% of goal)	Supporting measures 6 Environmental/health improvements realized or influenced by OIG work 121 Environmental, chemical safety, or business policy, practice, or process change made, or decision implemented 0 Legislative or regulatory changes
Annual Performance Goal 2: Recommendations, challenges, best practices, or risks identified for action	
Target: 460 Reported: 966 (210% of goal)	Supporting measures 20 Certifications, verifications, and validations *290 Recommendations for improvement (including risk identified) 31 Referrals for Agency action *624 OIG-identified findings in external reports impacting EPA
Annual Performance Goal 3: Return on investment: potential dollar return as percentage of OIG budget	
Target: \$80,427,200 (160% of budget) Reported: \$83,230,723 (103% of target)	Supporting measures (in millions) OIG budget: \$53.1 Potential return: \$83.2 *\$1.375 Questioned costs \$62.292 Potential monetary benefits identified in reports—excluding questioned costs \$18.272 Monetary actions taken or resolved prior to report issuance \$0.021 Actual cost saved identified after report issuance \$0.521 Cost avoidance savings/cost savings identified after report issuance or based on investigative results \$0.040 Fines, penalties, settlements, and restitutions resulting from EPA OIG investigations \$0.710 Fines, penalties, settlements, and restitutions resulting from joint investigations between EPA OIG and other entities
Annual Performance Goal 4: Criminal, civil, and administrative actions reducing risk, and loss of resources and operational integrity taken or influenced by OIG work	
Target: 200 Reported: 279 (140% of goal)	Supporting measures 65 Allegations disproved 12 Indictments, informations, and complaints 4 Criminal convictions 0 Civil actions 44 Administrative actions taken (other than debarments or suspensions) 18 Suspension or debarment actions 136 Fraud briefings conducted
Other (no targets established)	
Savings and recommendations sustained: <ul style="list-style-type: none"> *248 sustained environmental or business recommendations (resolved or agreed to) for action *\$0.032 million in sustained questioned costs \$72.25 million in sustained potential monetary benefits 	

Sources: The OIG Performance Measurement Results System and the Inspector General Enterprise Management System. (EPA OIG table)

* These measures include single audits, which are audits of nonfederal entities performed by private firms.


EPA's FYs 2020–2021 Management Challenges Issued

Report No. [20-N-0231](#), issued July 21, 2020 

The OIG is required by statute to prepare an annual report summarizing what we consider to be the “most serious management and performance challenges facing the agency.” Identifying and resolving top management challenges are essential to the EPA’s protection of human health and the environment. The *EPA’s FYs 2020–2021 Top Management Challenges* report documents and discusses eight risks and challenges facing EPA leadership through FY 2021:

- Maintaining operations during pandemic and natural disaster responses.
- Complying with key internal control requirements, including developing risk assessments, ensuring quality data, and creating effective operational policies and procedures.
- Overseeing states, territories, and tribes responsible for implementing EPA programs.
- Improving workforce/workload analyses to accomplish the EPA’s mission efficiently and effectively.
- Enhancing information technology security to combat cyberthreats.
- Communicating risks to allow the public to make informed decisions about its health and the environment.
- Fulfilling mandated reporting requirements.
- Integrating and leading environmental justice across the Agency and government.

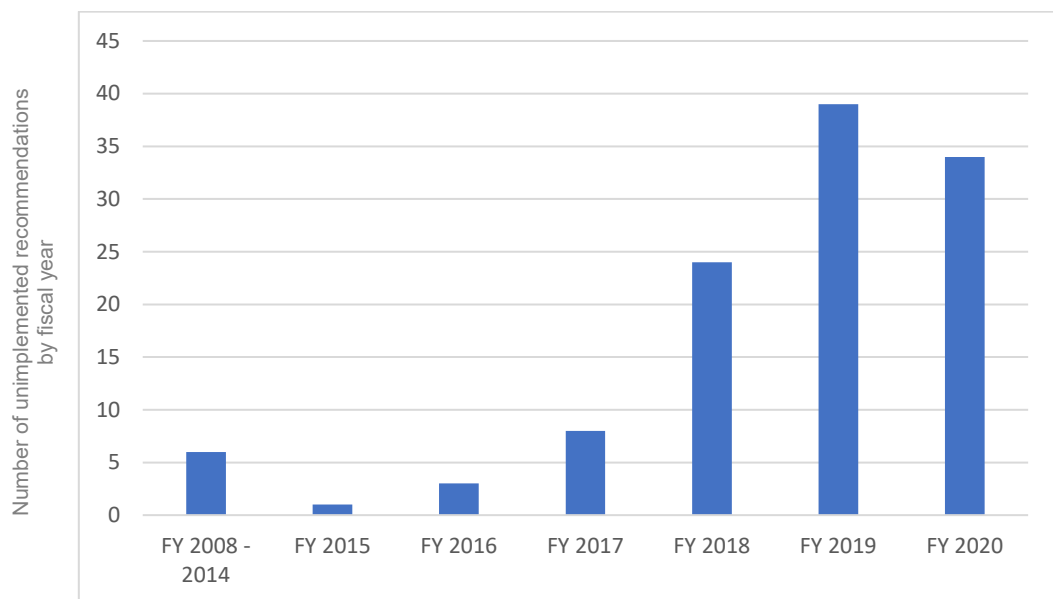
To identify the EPA’s top management challenges, we conducted a formal survey of EPA leadership and discussed management challenges in outreach meetings with Agency offices. The OIG also considered, among other sources, the previous work of the OIG and the U.S. Government Accountability Office, as well as public statements by EPA leaders to the press and Congress. Finally, the OIG solicited comments and suggestions through the EPA’s Office of the Chief Financial Officer.

The OIG views all eight challenges as critically important to EPA operations. These challenges are also an important part of how the OIG will determine the work it undertakes in FY 2021. In this semiannual report, we identify which management challenges our reports address, as applicable, next to the following symbol: .

Status of OIG Unimplemented Recommendations

OIG audits and evaluations provide recommendations to improve EPA or CSB programs and operations. The EPA, the CSB, and the public benefit from the implementation of these recommendations. We have analyzed the list of unimplemented recommendations in Appendix 3 and provided the results of that analysis below. Unimplemented recommendations are those that have been agreed to by the Agency but for which corrective action has not been completed. Recommendations that are unresolved are not counted as unimplemented recommendations. Unresolved recommendations are those with which the Agency disagrees, the Agency did not provide a formal written response, the Agency response is incomplete, or the OIG does not agree that the Agency’s proposed corrective actions are responsive to the recommendation. Recommendations that remain unresolved six months after the final report is issued are listed in Appendix 2.

Unimplemented recommendations as of September 30, 2020
(presented by fiscal year issued)



For the semiannual reporting period ending September 30, 2020, the EPA cumulatively had 112 unimplemented recommendations and the CSB had three unimplemented recommendations. The potential monetary benefits of these recommendations are approximately \$74 million for the EPA and \$349,000 for the CSB.

The table below shows the status of the recommendations, which fall into six categories. The three CSB reports are included in the “Management and Operations” category.

Category	Total	
	Number of unimplemented recommendations	Potential monetary benefits (in \$000s)
<i>EPA Unimplemented Recommendations</i>		
1. Management and Operations	32	\$46,122
2. Water Quality	14	0
3. Environmental Contamination and Cleanup	16	27,800
4. Toxics, Chemical Safety, and Pesticides	21	0
5. Air Quality	21	0
6. Research and Laboratories	8	0
EPA subtotal	112	\$73,922
<i>CSB Unimplemented Recommendations</i>		
Management and Operations	3	\$349
CSB subtotal	3	349
TOTAL	115	\$74,271

Category 1—Management and Operations

Of the recommendations we have issued related management and operations, 35 recommendations across 19 reports remain unimplemented. Three of these unimplemented recommendations were issued to the CSB, while 32 were issued to the EPA. When implemented, these recommendations will lead to more effective and efficient operations and potential monetary benefits of \$46.1 million for the EPA and \$349,000 for the CSB:

- Improve oversight of:
 1. Reporting under the Grants Oversight and New Efficiency Act and timeliness of expired grant closeouts (Report No. [20-P-0126](#)). *The potential monetary benefit of this unimplemented recommendation is \$8.3 million.*
 2. Incident readiness by better managing homeland security and emergency response equipment (Report No. [20-P-0066](#)). *The potential monetary benefit of this unimplemented recommendation is \$835,000.*
 3. The Office of Air and Radiation's timekeeping practices and outdated EPA *Leave Manual* (Report No. [20-P-0063](#)).
 4. The EPA's fiscal years 2019 and 2018 (restated) consolidated financial statements (Report No. [20-F-0033](#)).
 5. Information security protection role-based training for contractors (Report No. [20-P-0007](#)).
 6. EPA policy on records management (Report No. [19-P-0283](#)).

7. The Senior Environmental Employment program (Report No. [19-P-0198](#)).
 8. Overpaid invoices (Report No. [19-P-0157](#)). *The potential monetary benefit of this unimplemented recommendation is \$5,000.*
 9. Companies with multiple cleanup liabilities that self-insure (Report No. [18-P-0059](#)).
 10. The CSB’s agency governance and operations (Report No. [16-P-0179](#)). *The potential monetary benefit of this unimplemented recommendation is \$349,000.*
 11. Grants execution in the U.S. Virgin Islands (Report No. [15-P-0137](#)). *The potential monetary benefit of this unimplemented recommendation is \$37 million.*
 12. Emergency and rapid response contracts (Report No. [14-P-0109](#)).
- Implement better processes for information technology regarding:
 13. The EPA’s risk management and incident response information security functions (Report No. [20-P-0120](#)).
 14. The CSB’s Risk Management, Identity and Access Management, and Incident Response (Report No. [20-P-0077](#)).
 15. Enterprise customer service solution oversight (Report No. [19-P-0278](#)).
 16. Pesticide registration fee, vulnerability mitigation, and database security controls for the EPA’s Federal Insecticide, Fungicide, and Rodenticide Act and Pesticide Registration Improvement Act systems (Report No. [19-P-0195](#)).
 17. Combatting cyber threats due to insufficient practices for managing known security weaknesses and system settings (Report No. [19-P-0158](#)).
 18. The CSB’s “Incident Response” and “Identity and Access Management” information security functions (Report [19-P-0147](#)).
 19. Individual personal identity verification cards and access to computer equipment (Report No. [19-F-0003](#)).

Category 2—Water Quality

Of the recommendations we have issued related to water quality, 14 recommendations across seven reports remain unimplemented. When implemented, these recommendations will lead to improved human health and environment, as well as more effective and efficient operations:

1. Improve oversight of notice to the public on drinking water risks to better protect human health (Report No. [19-P-0318](#)).
2. Improve emergency outreach to disadvantaged communities (Report No. [19-P-0236](#)).
3. Act on transfer request and petition regarding Ohio’s concentrated animal feeding operation permit program (Report No. [19-N-0154](#)).

4. Strengthen oversight of state drinking water programs to improve response to drinking water contamination emergencies such as in Flint, Michigan (Report No. [18-P-0221](#)).
5. Provide leadership and better guidance to improve fish advisory risk communications (Report No. [17-P-0174](#)).
6. Improve management of the Oil Pollution Prevention program (Report No. [12-P-0253](#)).
7. Revise outdated or inconsistent EPA-state clean water memorandums of agreement (Report No. [10-P-0224](#)).

Category 3—Environmental Contamination and Cleanup

Of the recommendations we have issued related to environmental contamination and cleanup, 16 recommendations across six reports remain unimplemented. When implemented, these recommendations will lead to improved human health and environment, more effective and efficient operations, and potential monetary benefits of \$27.8 million:

1. Stop the use of unapproved slag at Anaconda Co. Smelter Superfund Site and inform the public of the health risks of using the slag (Report No. [20-N-0030](#)).
2. Improve compliance, nationwide reporting, and tracking at four EPA Superfund sites reviewed (Report No. [20-P-0011](#)).
3. Implement more efficient and effective methods to assess the impact of unregulated pollutants in land-applied biosolids (Report No. [19-P-0002](#)).
4. Finish prioritization and resource allocation methodologies for abandoned uranium mine sites on or near Navajo lands (Report No. [18-P-0233](#)).
5. Revise risk management inspection guidance to recommend minimum inspection scope and provide detailed examples of minimum reporting (Report No. [13-P-0178](#)).
6. Make better use of Stringfellow Superfund Special Accounts (Report No. [08-P-0196](#)). *The potential monetary benefit of this unimplemented recommendation is \$27.8 million.*

Category 4—Toxics, Chemical Safety, and Pesticides

Of the recommendations we have issued related to toxics, chemical safety, and pesticides, 21 recommendations across nine reports remain unimplemented. When implemented, these recommendations will lead to improved human health and environment:

1. Facilitate better coordination regarding the EPA's Toxic Substance Control Act Consent Orders (Report No. [20-E-0177](#)).
2. Report accurate data under the Grants Oversight and New Efficiency Act and improve timeliness of expired grant closeouts (Report No. [20-P-0126](#)).

3. Develop circuit rider inspector guidance (Report No. [20-P-0012](#)).
4. Effectively implement the Lead-Based Paint Renovation, Repair and Painting Rule (Report No. [19-P-0302](#)).
5. Determine strategies and level of support for overseeing State Managed Pollinator Protection Plans (Report No. [19-P-0275](#)).
6. Improve measures and management controls over the pesticide emergency exemption process (Report No. [18-P-0281](#)).
7. Evaluate the impact of the revised Agricultural Worker Protection Standard on pesticide exposure incidents (Report No. [18-P-0080](#)).
8. Manage pesticide funds more efficiently (Report No. [17-P-0395](#)).
9. Take additional measures to prevent deaths and serious injuries from residential fumigations (Report No. [17-P-0053](#)).

Category 5—Air Quality

Of the recommendations we have issued related to air quality, 21 recommendations across nine reports remain unimplemented. When implemented, these recommendations will lead to improved human health and the environment:



1. Inform residents living near ethylene oxide-emitting facilities about health concerns and actions to address those concerns (Report No. [20-N-0128](#)).
2. Improve the EPA’s emergency planning to better address air quality concerns during future disasters (Report No. [20-P-0062](#)).
3. Improve oversight for particulate matter emissions compliance testing (Report No. [19-P-0251](#)).
4. Develop required cost-and-benefit analyses and assess air quality impacts on children’s health for Proposed Glider Repeal Rule allowing used engines in heavy-duty trucks (Report No. [20-P-0047](#)).
5. Enhance verification of continuous monitoring system performance for air emissions data (Report No. [19-P-0207](#)).
6. Improve the on-road heavy-duty vehicle compliance program (Report No. [19-P-0168](#)).
7. Improve controls to address strategic risks in the light-duty vehicle compliance program and achieve compliance with mobile source regulations (Report No. [18-P-0181](#)).
8. Improve data and oversight to assure compliance with the standards for benzene content in gasoline (Report No. [17-P-0249](#)).
9. Meet certain statutory requirements to identify environmental impacts of the Renewable Fuel Standard (Report No. [16-P-0275](#)).

Category 6—Research and Laboratories

Of the recommendations we have issued related to research and laboratories, eight recommendations across two reports remain unimplemented. When implemented, these recommendations will lead to improved human health and environment, as well as more effective and efficient operations:

1. Improve regional research programs with enhanced project tracking (Report No. [19-P-0123](#)).
2. Develop a comprehensive vision and strategy for citizen science that aligns with the Agency’s strategic objectives on public participation (Report No. [18-P-0240](#)).

Furthering EPA's Efforts to Protect Human Health and Environment

When planning and conducting audits and evaluations, we always consider how our efforts can support both the OIG's mission to promote economy and efficiency in Agency operations and the EPA's mission to protect human health and the environment. The table below shows how our reports issued during the second half of FY 2020 support the Agency and OIG missions. Throughout this semiannual report, we identify which Agency efforts our reports address, as applicable, next to the following symbol: . Also, reports summarizing the results of audit and evaluations conducted to meet statutory requirements are identified with asterisks in the table below and elsewhere in this semiannual report by the following symbol: .

OIG-Issued Reports Related to EPA Programs and Operations

OIG report	Report no.	Improving air quality	Ensuring clean/safe water	Cleaning up/ revitalizing land	Ensuring safety of chemicals	Improving EPA research programs	Compliance with the law	Partnering with states/ others	Operating efficiently/ effectively
EPA May Have Overpaid for Its \$13 Million Time and Attendance System by Not Following Information Technology Investment Requirements	20-P-0134								X
Fiscal Years 2018 and 2017 Financial Statements for the Pesticide Registration Fund*	20-F-0135								X
EPA's Processing Times for New Source Air Permits in Indian Country Have Improved, but Many Still Exceed Regulatory Time Frames	20-P-0146	X							
EPA Complied with Improper Payments Legislation, but Internal Controls Need Substantial Improvement to Ensure More Accurate Reporting*	20-P-0167						X		
EPA Oversight Provided Reasonable Controls to Deter and Minimize Trespassing at the Fort Ord Superfund Site	20-E-0169			X					
EPA Needs to Conduct Risk Assessments When Designing and Implementing Programs	20-P-0170								X
Further Efforts Needed to Uphold Scientific Integrity Policy at EPA	20-P-0173					X			
EPA Toxic Substances Control Act Consent Orders Need Better Coordination	20-E-0177				X				
Fiscal Years 2018 and 2017 Financial Statements for the Pesticide Reregistration and Expedited Processing Fund*	20-F-0184								X
EPA's Office of the Chief Financial Officer Lacks Authority to Make Decisions on Employee-Debt Waiver Requests	20-P-0194								X
EPA Needs to Address Internal Control Deficiencies in the Agencywide Quality System	20-P-0200								X
EPA's Initial Implementation of CARES Act Section 3610	20-N-0202								X
EPA's Safer Choice Program Would Benefit from Formal Goals and Additional Oversight	20-P-0203				X				

OIG report	Report no.	Improving air quality	Ensuring clean/safe water	Cleaning up/ revitalizing land	Ensuring safety of chemicals	Improving EPA research programs	Compliance with the law	Partnering with states/ others	Operating efficiently/ effectively
EPA Needs to Improve Oversight of Research Assistance Agreements	20-P-0204					X			X
Internal Quality Assurance Review of EPA OIG Audit Assignments Completed in Fiscal Year 2019*	20-N-0230								
EPA's FYs 2020-2021 Top Management Challenges*	20-N-0231	X	X	X	X	X	X	X	X
EPA Needs to Improve Oversight of How States Implement Air Emissions Regulations for Municipal Solid Waste Landfills	20-P-0236	X							
EPA's Fiscal Years 2018 and 2017 Hazardous Waste Electronic Manifest System Fund Financial Statements*	20-F-0244								X
EPA Needs to Strengthen Controls Over Required Documentation and Tracking of Intergovernmental Personnel Act Assignments	20-P-0245						X		X
EPA's 2018 BEACH Act Report to Congress Does Not Fully Meet Statutory Requirements	20-E-0246		X				X		
Lack of Planning Risks EPA's Ability to Meet Toxic Substances Control Act Deadlines	20-P-0247				X				
Management Alert: EPA Region 5 Needs to Implement Effective Internal Controls to Strengthen Its Records Management Program	20-E-0295								X
Fiscal Years 2019 and 2018 Financial Statements for the Pesticides Reregistration and Expedited Processing Fund*	20-F-0308								X
EPA Needs to Improve Processes for Securing Region 8's Local Area Network	20-E-0309								X
Fiscal Years 2019 and 2018 Financial Statements for the Pesticide Reregistration and Expedited Processing Fund*	20-F-0328								X
EPA's Lack of Oversight Resulted in Serious Issues Related to an Office of Water Contract, Including Potential Misallocation of Funds	20-P-0331								X
EPA Has Sufficiently Managed Emergency Responses During the Pandemic but Needs to Procure More Supplies and Clarify Guidance	30-E-0332			X					
Improved EPA Oversight of Funding Recipients' Title VI Programs Could Prevent Discrimination	20-E-0333						X		X
Regions 1 and 5 Need to Require Tribes to Submit More Detailed Work Plans for Grants	20-P-0335								X
Data Used for Annual Toxics Release Inventory Are 99 Percent Complete, but EPA Could Improve Certain Data Controls	20-P-0337								X
Audit of EPA's Toxic Substances Control Act Service Fee Fund Financial Statements for the Period from Inception (June 22, 2016) through September 30, 2018*	20-F-0342								X

* Meets statutory requirements.

Instances of Whistleblower Retaliation and Interference with Independence

Whistleblower Retaliation

Section 5(a)(20) of the Inspector General Act of 1978, as amended, requires a detailed description of any instances of whistleblower retaliation noted by the EPA OIG. This requirement includes reporting information about an official found to have engaged in retaliation and the consequences the Agency imposed to hold that official accountable. There were no whistleblower retaliation cases closed within the semiannual period ending September 30, 2020. No officials were found to have engaged in retaliation.

Interference with Independence

Section 5(a)(21) of the Inspector General Act requires a detailed description of any attempt by the Agency to interfere with the independence of the EPA OIG, including “incidents where the establishment has resisted or objected to oversight activities of the [OIG] or restricted or significantly delayed access to information, including the justification of the establishment for such action.”

In its previous *Semiannual Report to Congress* (Report No. [EPA-350-R-20-001](#), issued May 2020), the OIG recounted its issuance of a “Seven-Day Letter” to the administrator, which identified interference with the OIG’s independence through the refusal of a senior Agency official to participate in interviews related to an investigation and an audit. The administrator sent the Seven-Day Letter to Congress, accompanied by a memorandum from the EPA general counsel, which significantly narrowed the OIG’s authority to access information. Three chairs of U.S. House of Representatives committees have subsequently urged the Agency to withdraw the general counsel’s memorandum, observing that, “if accepted, [it] would eviscerate the authority of the Inspector General and undermine the ability of EPA to function in a transparent manner.” The Agency, however, has not withdrawn the general counsel’s memorandum. Left in place, this memorandum signals to all EPA employees that they do not need to fully cooperate with the OIG in the pursuit of its mission to detect and prevent fraud, waste, and abuse.

The Inspector General Act, specifically 5 U.S.C. app. § 6(a)(1)(A), authorizes the OIG “to have timely access to all records, ... documents, ... or other materials” relating to Agency programs or operations. As described in an audit report that we issued on September 25, 2020, *EPA’s Lack of Oversight Resulted in Serious Issues Related to an Office of Water Contract, Including Potential Misallocation of Funds*, Report No. [20-P-0331](#), an Agency employee destroyed financial tracking documents after the OIG requested those documents. The Agency contended that the deleted documents were not

records but were instead “working papers” that the Agency was not obligated to maintain pursuant to the Federal Records Act, even though the OIG had requested the documents prior to their destruction. The OIG is authorized to access documents available to the Agency regardless of whether they are records pursuant to the Act.

During a criminal investigation, an Agency manager directed staff to withhold pertinent information and allegations of possible fraud from the OIG. Additionally, the manager attempted to restrict OIG efforts to communicate with and obtain information from Agency personnel and an EPA contractor. The manager claimed to have adequately addressed the issues underlying the allegations and expressed a desire to keep the allegations “in-house.” The OIG informed Agency counsel of the manager’s interference. The Agency manager agreed to discontinue this conduct.

Significant OIG Activity

Congressionally Requested Activities

Briefings, Requests, and Inquiries

During this reporting period, the OIG provided 13 briefings to Congress on the OIG's oversight work. Briefings involved OIG staff meeting with congressional staff to better understand their perspectives, obtain feedback on the OIG, and establish the foundation for an open dialogue. Other briefings included discussions with House and Senate Appropriations Committee staff of recent, ongoing, and future OIG work. During the reporting period, the OIG received 11 congressional requests.

Coronavirus Pandemic: Oversight Activities

Pandemic Management Challenges Identified

Top Pandemic-Related Challenges Facing the EPA

[Issued](#) June 17, 2020


During the coronavirus pandemic—that is, the SARS-CoV-2 virus and resultant COVID-19 disease—the EPA has had to continue its core mission of protecting human health and the environment while also adjusting to and absorbing fresh demands added by the pandemic. These new demands include approving new disinfectants, conducting pandemic-related scientific research, and overseeing delegated permitting and enforcement programs. To this end, the CARES Act provides the EPA with \$7.23 million to clean and disinfect EPA facilities, fund research on methods to reduce the risks from environmental transmission of SARS-CoV-2 via contaminated surfaces or materials, and expedite registration and other actions related to pesticides to address SARS-CoV-2, among other things.


The OIG has identified challenges and associated risks to the EPA’s ability to successfully implement Agency programs and maintain a safe and productive workforce during the coronavirus pandemic. These challenges include risk communication, enforcement and fraud risks, and effective remote technology. Some of the Agency’s immediate responses to the coronavirus pandemic include approving disinfectants to kill SARS-CoV-2 on surfaces and developing a list of products that are registered to destroy viruses known to be as or more difficult to kill than SARS-CoV-2. The EPA is also allowing companies to change, without its usual prior approval, suppliers of certain active ingredients in approved products to address pesticide supply chain shortages. The EPA has made adjustments to programs and operations by, for example, issuing regulatory waivers and allowing exceptions to regulatory requirements, policy, and internal controls.

Reports Related to EPA’s Pandemic Response

EPA Has Sufficiently Managed Emergency Responses During the Pandemic but Needs to Procure More Supplies and Clarify Guidance

Report No. [20-E-0332](#), issued September 28, 2020

 *Cleaning up and revitalizing land*

 *Maintaining operations during pandemic and natural disaster responses*


The EPA sufficiently protected human health and the environment by responding to emergencies during the pandemic and taking some initial measures to protect its on-scene coordinators, who respond to emergency incidents. In an OIG survey, however, some on-scene coordinators said that the EPA did not provide sufficient supplies and

that they either had issues complying with the EPA’s health and safety guidance or needed additional clarification about the guidance. In addition, one regional manager said that a lack of N95 masks may make it difficult for the EPA to respond to large emergency incidents such as wildfires. The Agency agreed with our recommendation to clearly communicate with on-scene coordinators about safety concerns that the guidance does not sufficiently address, but it disagreed with our other three recommendations. Resolution efforts are in progress.

EPA’s Initial Implementation of CARES Act Section 3610

Report No. [20-N-0202](#), issued June 29, 2020

 *Operating efficiently and effectively*

 *Maintaining operations during pandemic and natural disaster responses*

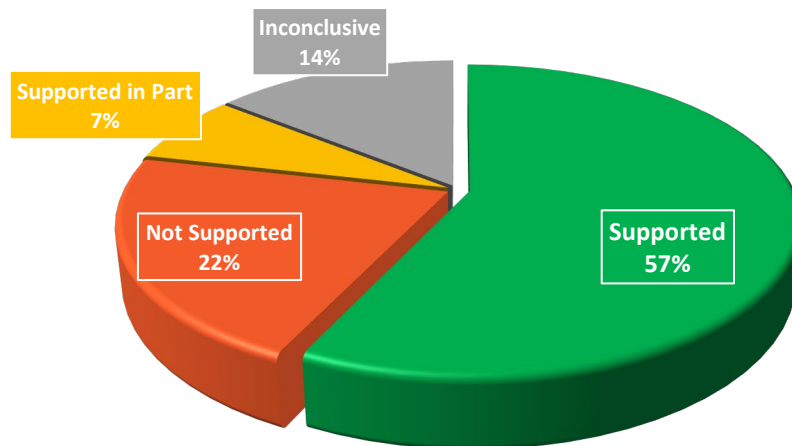
The EPA created and provided detailed guidance to its contracting personnel and contractors regarding the reimbursement of contractors under Section 3610 of the Coronavirus Aid, Relief, and Economic Security Act, known as the CARES Act. Enacted in March 2020, the Act authorizes—but does not require—federal agencies to modify the terms and conditions of a contract to reimburse contractors that provide pandemic-related paid leave to their employees or subcontractors. The EPA’s final guidance was consistent with the statute, and we made no recommendations.

OIG Investigations Related to Pandemic

The Office of Investigations opened a number of cases to investigate allegations of fraud related to SARS-CoV-2. Allegations investigated included schemes to defraud Americans through, among other things, the misuse of the EPA logo or seal. The office investigated many of these cases jointly with the EPA Criminal Investigation Division or other law enforcement agencies, and coordinated with and referred matters to the EPA, as appropriate.

The pie chart below reflects the conclusions of the 14 pandemic-related cases closed during this semiannual reporting period.

Results of closed cases involving the coronavirus pandemic



Source: Office of Investigations. (EPA OIG graphic)

OIG Transparency Efforts

Webpage: EPA OIG's Response to the COVID-19 Pandemic

[Launched](#) May 2020, continually updated

To ensure transparency and keep the public up to date on our efforts, we maintain a website of our work related to the pandemic. This website lists potential audit or evaluation topics, recently announced projects, potential investigation targets, and issued reports.

COVID-19 Pandemic Report: Summary of Oversight Activities as of July 31, 2020


[Issued](#) July 31, 2020

This summary report captures the OIG's work to meet the new challenges posed by the coronavirus pandemic. The OIG has begun and will continue to initiate audits, evaluations, and investigations related to the impact of the coronavirus pandemic on the EPA and the CSB. We are examining and identifying how the pandemic has impacted Agency programs and operations, as well as potential misconduct and criminal activity. Some subjects we have looked at or may look at include the EPA's responses to emergency incidents such as hurricanes and wildfires; fraud schemes involving cleaning products; Agency staffing shortfalls; employees' health and safety when returning to work; maintaining strong information technology protections while teleworking; and cyberscams and security threats targeting the Agency or its employees, contractors, and grantees. To accomplish these pandemic-focused oversight initiatives, we are working and coordinating with other federal OIGs, the Pandemic Response Accountability Committee under the Council of the Inspectors General on Integrity and Efficiency, and the U.S. Government Accountability Office.

Human Health and Environmental Issues

Further Efforts Needed to Uphold Scientific Integrity Policy at EPA

Report No. [20-P-0173](#), issued May 20, 2020

 *Improving EPA research programs*


The results of the OIG’s 2018 agencywide survey on scientific integrity—which received 4,320 responses (a 23.5 percent response rate)—showed that 3,987 respondents were aware of or had some familiarity with the EPA’s Scientific Integrity Policy. Among 1,842 respondents with a basis to judge, 1,025 (56 percent) were satisfied with the overall implementation of the Scientific Integrity Policy. While the Scientific Integrity Committee has implemented many requirements from the Scientific Integrity Policy and identified actions to improve scientific integrity at the EPA, procedures to address potential violations were not finalized, mandatory training was not tracked, annual reporting was not timely, and the release of scientific products was not supported by a centralized clearance system. The EPA agreed with our 12 recommendations and has completed corrective actions for two of them.

Further information on the EPA’s Scientific Integrity Policy efforts can be found under the “Scientific Integrity and Misconduct Issues” section in this report.

Improved EPA Oversight of Funding Recipients’ Title VI Programs Could Prevent Discrimination

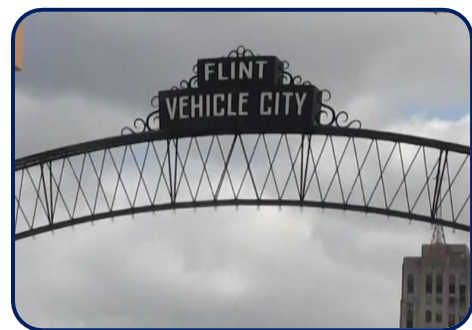
Report No. [20-E-0333](#), issued September 28, 2020

 *Compliance with the law; Operating efficiently and effectively*

 *Integrating and leading environmental justice;*

Complying with key internal control requirements (policies and procedures)

The EPA has not fully implemented an oversight system to provide reasonable assurance that Agency funding recipients are complying with Title VI of the Civil Rights Act of 1964, which requires agencies to be responsible for ensuring that programs or agencies receiving federal financial assistance do not discriminate based on race, color, or national origin. We made six recommendations, including that the Agency develop guidance on systemic issues underlying Title VI complaints and develop metrics to assess the effectiveness of Title VI tools and programs. As the Agency has not yet provided a formal response to our report, all of our recommendations are unresolved.



The St. Francis Prayer Center in Flint, Michigan, filed a discrimination complaint with the EPA. (EPA OIG photo)

EPA Needs to Improve Oversight of How States Implement Air Emissions Regulations for Municipal Solid Waste Landfills

Report No. [20-P-0236](#), issued July 30, 2020



Improving air quality



Complying with key internal control requirements (data quality);

Overseeing states, territories, and tribes implementing EPA programs

We identified 12 large municipal solid waste landfills in Georgia and Texas that could be operating without the Title V permits required by the Clean Air Act and EPA regulations. The EPA did not identify deficiencies in how Georgia and Texas implemented Clean Air Act regulations to control air emissions from municipal solid waste landfills, nor did it implement a federal plan to implement Clean Air Act regulations for the State of Arkansas when there was no approved state plan for Arkansas. The Agency agreed with our four recommendations to determine whether the 12 municipal solid waste landfills identified in our report should apply for Title V permits, to help Arkansas develop a state plan or implement the federal plan, and to develop a process to review implementation of Clean Air Act regulations. The Agency disagreed with our remaining three recommendations, and resolution efforts are in progress.

EPA's Safer Choice Program Would Benefit from Formal Goals and Additional Oversight

Report No. [20-P-0203](#), issued June 30, 2020



Ensuring the safety of chemicals


The EPA's Safer Choice program—designed to prevent pollution by encouraging the use of safer chemicals in products—does not list its goals in the *FY 2018–2022 U.S. EPA Strategic Plan*, and the program has not reported results for FYs 2018–2019, which limits the program's accountability to Congress and the public. The program does have internal, non-outcome-oriented goals to add 200 products and 25 chemicals to the Safer Chemical Ingredients List each year, which it is generally achieving. The program relies on third-party auditors to ensure Safer Choice products comply with program criteria, but the EPA does not conduct effective oversight of these auditors. The EPA risks approving products that do not comply with the Safer Choice Standard. The EPA agreed with our recommendations.



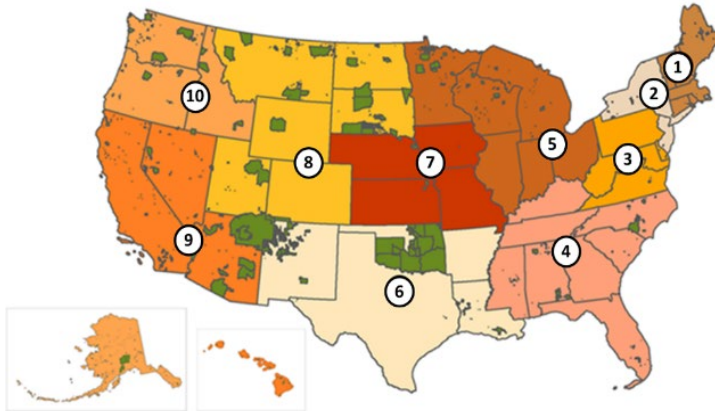
Safer Choice product vat. (EPA OIG photo)

EPA's Processing Times for New Source Air Permits in Indian Country Have Improved, but Many Still Exceed Regulatory Time Frames

Report No. [20-P-0146](#), issued April 22, 2020

 *Improving air quality*

Of all the tribal minor-source-New Source Review permits that the EPA issued between 2011 and August to October 2018, 62 percent exceeded the applicable regulatory time frame. The permits are a part of the Clean Air Act's preconstruction permitting program




Indian Country (in green) spans across all ten EPA regions. (EPA OIG graphic made from data from the U.S. Census Bureau)

for new sources of emissions and modifications to existing sources of emissions in Indian Country. In addition, not all EPA regions accurately documented when the applications for these permits were deemed complete, and the Agency did not have a systematic approach to identify non-filers, which are facilities on tribal lands that need but have not applied for a permit. The Agency agreed with our six recommendations, including to establish a permit tracking system,

develop guidance to determine complete applications, identify those sources that do not have the required permit, and educate emission sources on their permitting responsibilities.

EPA Toxic Substances Control Act Consent Orders Need Better Coordination

Report No. [20-E-0177](#), issued May 28, 2020

 *Ensuring the safety of chemicals*

The Office of Chemical Safety and Pollution Prevention did not consult with the Office of Enforcement and Compliance Assurance when issuing the 2009 Toxic Substances Control Act Section 5(e) consent order given to DuPont (now The Chemours Company) to manufacture two GenX chemicals—even though the Office of Enforcement and Compliance Assurance is responsible for verifying that companies comply with Section 5(e) consent orders. Furthermore, EPA Region 4 inspectors were unaware of the 2009 consent order until EPA headquarters requested that they inspect Chemours's Fayetteville Works facility. We recommended that the Office of Enforcement and Compliance Assurance review all consent orders it is responsible for and that the Agency provide final consent orders to the appropriate regional offices. The Agency agreed with both our recommendations and has completed one.

Lack of Planning Risks EPA’s Ability to Meet Toxic Substances Control Act Deadlines

Report No. [20-P-0247](#), issued August 17, 2020

 Ensuring the safety of chemicals  Improving workforce/workload analyses

Although the EPA met several of the deadlines imposed by the Frank R. Lautenberg Chemical Safety for the 21st Century Act, which amended the Toxic Substances Control Act of 1976, the Agency did not complete all ten required existing chemical risk evaluations by the June 19, 2020

deadline. The EPA also missed several more reporting and document development deadlines. In addition, the required number of existing chemical risk evaluations doubled at the end of 2019. The EPA’s Office of Pollution Prevention and Toxics, which is responsible for implementing the Toxic

Substances Control Act amendments, lacks a workforce-and-workload analysis to successfully meet the deadlines. The Agency agreed with our three recommendations to publish a plan

identifying anticipated Toxic Substances Control Act implementation efforts and required resources, conduct a workforce analysis to assess its capability to implement the Act, and specify skill gaps that need to be filled by FY 2021 to meet Act’s requirements.



Staff and
resource
planning



The EPA’s ability to assess its Toxic Substances Control Act workload—and subsequently estimate the workforce levels necessary to achieve that workload—is critically important. (EPA OIG graphic)

EPA’s 2018 BEACH Act Report to Congress Does Not Fully Meet Statutory Requirements

Report No. [20-E-0246](#), issued August 13, 2020

 Ensuring clean and safe water; Compliance with the law
 Fulfilling mandated reporting requirements

The Beaches Environmental Assessment and Coastal Health Act of 2000, known as the BEACH Act, requires the EPA to submit reports every four years to Congress regarding the Agency’s BEACH Act program. However, the EPA’s 2018 report to Congress did not fully meet the reporting requirements of the Act or the Plain Writing Act of 2010, nor did it comply with U.S. Office of Management and Budget internal control principles. By issuing a report that did not fully meet the requirements of the BEACH Act and the Plain Writing Act, the EPA missed the opportunity to provide Congress with the information needed for effective decision-making. The Agency disagreed with our two recommendations, and resolution efforts are in progress.

Data Used for Annual Toxics Release Inventory National Analysis Are 99 Percent Complete, but EPA Could Improve Certain Data Controls

Report No. [20-P-0337](#), issued September 30, 2020



Operating efficiently and effectively



Complying with key internal control requirements (data quality)

The EPA's Toxics Release Inventory National Analysis publishes data submitted by facility owners and operators on each toxic chemical they reported using in the preceding calendar year in amounts that exceeded the established toxic chemical threshold. Data reported to the EPA after it freezes the dataset in mid-October accounted for an average of less than one-half of 1 percent, or 70.3 million pounds, of the 15.2 billion total pounds reported from 2013 through 2016. The Agency agreed with our four recommendations, including that the EPA continue to follow up with facilities that do not report their data on time, analyze the impact of late-reported data, and establish controls to validate the accuracy of the data.

EPA Needs to Address Internal Control Deficiencies in the Agencywide Quality System

Report No. [20-P-0200](#), issued June 22, 2020

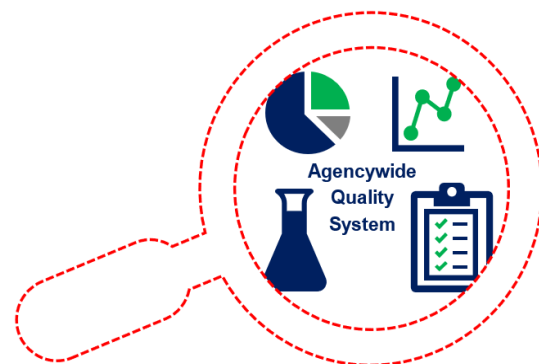


Operating efficiently and effectively



Complying with key internal control requirements (data quality)


The Office of Mission Support has not fully implemented internal controls for the EPA's agencywide Quality System, which outlines standards for environmental data collection activities conducted by or for the Agency. The EPA and the public rely upon the quality of the Agency's data, which helps the Agency make reliable, cost-effective, and defensible decisions. Activities covered by the Quality System include characterizing or evaluating ecological systems or human health, establishing ambient air conditions, developing models to characterize environmental processes, and mapping environmental conditions or human health risk data. Of our 15 recommendations—which included reviewing policies, procedures, and guidance within required time frames; conducting regular assessments of program and regional quality systems; and assessing staff and resource needs—the EPA agreed with 13, while two remain unresolved with resolution efforts in progress.



The EPA's Quality System's primary goal is to ensure that environmental data are of sufficient quantity and quality to support intended uses. (EPA OIG graphic)

EPA Oversight Provided Reasonable Controls to Deter and Minimize Trespassing at the Fort Ord Superfund Site

Report No. [20-E-0169](#), issued May 14, 2020

 *Cleaning up and revitalizing land*

The EPA, the U.S. Army, and other organizations use fencing and signage as institutional controls at Fort Ord, a 28,000-acre Superfund site in California, to deter and minimize trespassing and protect human health. Although trespassing continues to be an issue, a site visit confirmed that signs indicate the site is dangerous and entry is not allowed and that the integrity of the fencing and gates is not compromised. We made no recommendations in the report.




Locked gate to Fort Ord with signage indicating danger in the area and no trespassing allowed. (EPA OIG photo)

Agency Business Practices and Accountability

EPA Needs to Conduct Risk Assessments When Designing and Implementing Programs

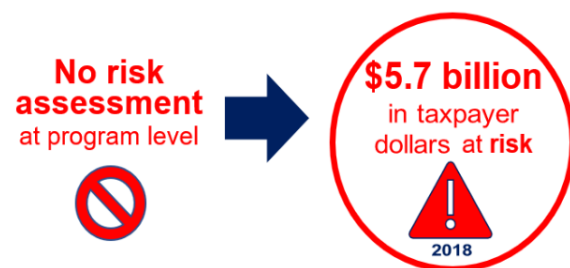
Report No. [20-P-0170](#), issued May 18, 2020

 Operating efficiently and effectively  Complying with key internal control requirements

In FY 2018, the EPA's program offices did not conduct program-level risk assessments when designing and implementing programs, even though such assessments are required by the U.S. Government Accountability Office and the Office of Management and Budget. We also found that the program offices were unable to distinguish between the Government Accountability

Office's requirement to assess risk at the program level and the Office of Management and Budget's requirement to address risk strategically using the Enterprise Risk Management process. In addition, the Agency's Enterprise Risk Management guidance did not address the Government Accountability Office's *Standards for Internal Control in the Federal*


Government, known as the Green Book. The Agency agreed with our recommendation to train staff who execute EPA programs on the Green Book, with emphasis on program-level risk assessments.




The EPA had not prepared program-level risk assessments for the 20 highest dollar value programs in fiscal year 2018, resulting in \$5.7 billion taxpayer dollars at risk. (EPA OIG graphic)

EPA Needs to Improve Oversight of Research Assistance Agreements

Report No. [20-P-0204](#), issued June 30, 2020

 Operating efficiently and effectively; Improving EPA research programs

 Complying with key internal control requirements (data quality)

EPA project officers for research assistance agreements awarded by the Agency did not always complete baseline monitoring accurately or in a timely manner, enforce recipient compliance with progress reporting requirements, or document their review of recipient progress reports. In addition, the EPA's Office of Research and Development did not consistently post the results of the research assistance agreements on its website. The EPA agreed with our seven recommendations regarding the monitoring, reporting, and posting of research projects funded by the EPA.

EPA May Have Overpaid for Its \$13 Million Time and Attendance System by Not Following Information Technology Investment Requirements

Report No. [20-P-0134](#), issued April 13, 2020

 Operating efficiently and effectively  Complying with key internal control requirements


The Office of the Chief Financial Officer did not perform several requirements before updating PeoplePlus, the EPA’s time and attendance system, such as conducting a cost analysis, considering alternative options, or conducting four of the five reviews required by the EPA’s Chief Information Officer system life cycle management procedure. As a result, the EPA cannot confirm that the upgrade was the best use of taxpayer funds. We found that if the EPA selected the U.S. Department of Interior’s Interior Business Center time-and-attendance system, the EPA could have saved between \$7.7 million and \$8.1 million based on the Interior Business Center estimates. The EPA agreed with our four recommendations—including conducting the required analyses and reviews—and has completed two.



The EPA missed the opportunity to save up to \$8 million in taxpayer funds by not performing cost and alternatives analyses (EPA OIG graphic).

EPA’s Office of the Chief Financial Officer Lacks Authority to Make Decisions on Employee-Debt Waiver Requests

Report No. [20-P-0194](#), issued June 15, 2020


 Operating efficiently and effectively

The Office of the Chief Financial Officer improperly made decisions on 15 employee-debt waiver requests totaling \$53,539. The agency claims officer—who is located in the Office of General Counsel—has the authority to waive employee debts up to \$100,000 for erroneous payments of pay and other allowances. Thus, the Office of the Chief Financial Officer should have referred the 15 employee-debt waivers to the agency claims officer. The Agency agreed with our recommendations to update policies and procedures to require employee-debt waivers be reviewed by the agency claims officer and to ensure employee-debt waiver decisions are made in accordance with applicable laws and directives.

EPA Needs to Strengthen Controls Over Required Documentation and Tracking of Intergovernmental Personnel Act Assignments

Report No. [20-P-0245](#), August 10, 2020

 Operating efficiently and effectively; Compliance with the law

 Complying with key internal control requirements (policies and procedures)

The EPA's use of assignments under the Intergovernmental Personnel Act—which allows for the temporary assignment of personnel between the federal government and






The EPA lacks adequate controls over the required documentation for and the tracking of Intergovernmental Personnel Act assignments. (EPA OIG graphic)

eligible nonfederal organizations—complied with statutory and regulatory requirements and with guidance issued by the U.S. Office of Personnel Management. However, the Agency lacked controls to verify that documents are submitted and maintained as required, as well as a reliable system to track employees on assignment. The Agency agreed with our recommendations to update its *Intergovernmental Personnel Act Policy and Procedures Manual (IPA)*, strengthen controls over assignment documentation, enforce requirements for noncompliance with these requirements, and strengthen controls over the tracking of employees on assignment.

EPA Complied with Improper Payments Legislation, but Internal Controls Need Substantial Improvement to Ensure More Accurate Reporting

Report No. [20-P-0167](#), issued May 13, 2020

 Compliance with the law  Fulfilling mandated reporting requirements 

In FY 2019, the EPA complied with all six of the requirements under the Improper Payments Elimination and Recovery Act of 2010, as modified by the Improper Payments Elimination and Recovery Improvement Act of 2012. However, the EPA needs to improve the accuracy and completeness of improper payments reporting for the grant payment stream. We identified an additional \$571,469.19 in improper payments that were not included in the FY 2019 Agency Financial Report. We also found that EPA employees who review grant payments were not following or sufficiently trained in improper-payment-review policies. The EPA agreed with our recommendation to verify that it implemented internal controls over reviewer training and proficiency but did not provide planned corrective actions that fully addressed the recommendation. The recommendation is unresolved with resolution efforts in progress.

Regions 1 and 5 Need to Require Tribes to Submit More Detailed Work Plans for Grants

Report No. [20-P-0335](#), issued September 29, 2020



Operating efficiently and effectively



Overseeing states, territories, and tribes responsible for implementing EPA programs

Federal law and EPA policies require tribes receiving grants from the Agency to develop and implement environmental programs to submit detailed work plans to ensure that costs claimed under the grants are reasonable, allocable, and allowable. We found that the work plans submitted by the Passamaquoddy Tribe in Region 1 and the Fond du Lac Band Tribe in Region 5 lacked adequate details regarding supply-related components, such as laptops and computer services, or funding amounts. We also identified \$16,533 in questioned costs for the Passamaquoddy Tribe and \$6,335 in questioned costs for the Fond du Lac Band Tribe. The Regions agreed with our recommendations.



The EPA provides financial assistance to tribes to help them develop and implement environmental programs. (EPA image)

EPA Needs to Improve Processes for Securing Region 8's Local Area Network

Report No. [20-E-0309](#), issued September 10, 2020



Operating efficiently and effectively



Enhancing information technology security

The vulnerability tests that the Office of Mission Support performs on Region 8's local area network—which includes the Region's headquarters, laboratory, Montana office, and Superfund Cost Recovery Package Imaging and Online System—were not comprehensive. Vulnerabilities could cause denial-of-service attacks, unauthorized disclosure of personally identifiable information, and corruption of scientific data. Region 8 agreed with our seven recommendations to update its local area network system security plan, verify that vulnerability tests and their results are comprehensive, and implement security controls to protect personally identifiable information on the Superfund Cost Recovery Package Imaging and Online System.

Audit of EPA’s Toxic Substances Control Act Service Fee Fund Financial Statements for the Period from Inception (June 22, 2016) through September 30, 2018

Report No. [20-F-0342](#), issued September 30, 2020

 Operating efficiently and effectively  Fulfilling mandated reporting requirements;  Complying with key internal control requirements (data quality; policies and procedures)

The Frank R. Lautenberg Chemical Safety for the 21st Century Act requires the EPA OIG to audit the Toxic Substances Control Act Service Fee Fund financial statements every year to determine whether the financial statements were fairly stated, internal controls were in place, and management complied with laws and regulations. We rendered an unmodified opinion, meaning that the statements were fairly presented and free of material misstatement. We noted that the EPA overstated expenses from other appropriations by \$8.4 million and that the Agency made errors in its calculation for expenses from other appropriations. The EPA agreed with our recommendations to improve the management review process and establish written policies and procedures.

Financial Statements for the Pesticide Registration Fund

 Operating efficiently and effectively 

Congress authorized the EPA to assess and collect pesticide registration fees, which are deposited into the Pesticide Registration Fund. The Pesticide Registration Improvement Act requires us to annually audit the Pesticide Registration Fund’s financial statements:

- Report No. [20-F-0135](#), *Fiscal Years 2018 and 2017 Financial Statements for the Pesticide Registration Fund*, issued April 14, 2020. We rendered an unmodified opinion on the FY 2018 financial statements, meaning that they were fairly presented and free of material misstatement. We rendered a qualified opinion on the financial statements for FY 2017, meaning that except for the possible effects of the Agency’s inability to support Pesticide Registration’s payroll accruals and related expenses, the FY 2017 financial statements were fairly presented. We made no recommendations in the report.
- Report No. [20-F-0328](#), *Fiscal Years 2019 and 2018 Financial Statements for the Pesticide Registration Fund*, issued September 23, 2020. We rendered an unmodified opinion on the FY 2019 and FY 2018 financial statements. We did note one material weakness: the EPA’s failure to properly record accounting adjustments and exercise due diligence in the preparation of the financial statements, which compromises their accuracy. The Agency agreed with our recommendation that the chief financial officer improve the management review of the financial statements.

Financial Statements for the Pesticides Reregistration and Expedited Processing Fund

 Operating efficiently and effectively  Fulfilling mandated reporting requirements 

The EPA is responsible for reassessing the safety of older pesticide registrations against modern health and environmental testing standards. To expedite the reregistration process, Congress authorizes the EPA to collect fees from pesticide manufacturers. These fees are deposited into the Pesticides Reregistration and Expedited Processing Fund, also known as the Federal Insecticide, Fungicide, and Rodenticide Act Fund. The Food Quality Protection Act requires that the OIG perform an annual audit of the financial statements for the Fund. In this semiannual period, we audited the FYs 2017 through 2019 Fund financial statements:

- Report No. [20-F-0184](#), *Fiscal Years 2018 and 2017 Financial Statements for the Pesticides Reregistration and Expedited Processing Fund*, issued June 1, 2020: We rendered an unmodified opinion on the financial statements for FY 2018, meaning they were fairly presented and free of material misstatement. We rendered a qualified opinion on the Fund’s financial statements for FY 2017, meaning that except for the possible effects of the Agency’s inability to support the Federal Insecticide, Fungicide, and Rodenticide Act’s payroll accruals and related expenses, the FY 2017 financial statements were fairly presented. The Agency agreed with our recommendation to adjust or monitor the annual pesticides maintenance fees so that the fees collected do not exceed the statutory targets for each fiscal year and completed the corrective action.
- Report No. [20-F-0308](#), *Fiscal Years 2019 and 2018 Financial Statements for the Pesticides Reregistration and Expedited Processing Fund*, issued September 8, 2020: For the FYs 2019 and 2018 financial statements, we rendered an unmodified opinion, meaning they were fairly presented and free of material misstatement. We made no recommendations in the report.



Pesticides being applied. (EPA photo)

EPA’s Fiscal Years 2018 and 2017 Hazardous Waste Electronic Manifest System Fund Financial Statements

Report No. [20-F-0244](#), issued August 10, 2020

 *Operating efficiently and effectively*  *Fulfilling mandated reporting requirements* 

The Hazardous Waste Electronic Manifest Establishment Act requires the EPA to prepare and the OIG to audit each year the accompanying financial statements of the EPA’s Hazardous Waste Electronic Manifest System fund, known as the e-Manifest fund. We rendered an unmodified opinion on the EPA’s fiscal years 2018 and 2017 e-Manifest fund financial statements and found them to be fairly presented and free of material misstatement. We noted two significant deficiencies: the EPA improperly recorded e-Manifest receivables and earned revenue and misclassified e-Manifest user fee revenue. The Agency agreed with our recommendations and completed corrective actions.

Investigations

Significant Investigations

Former Employee Debarred

On February 6, 2020, a former EPA Senior Executive Service official who served as the director of the National Enforcement Training Institute within the Office of Enforcement and Compliance Assurance's Office of Compliance was debarred for three years from participating in federal procurement and nonprocurement programs. The individual failed to maintain an active bar membership in at least one state, the District of Columbia, a U.S. territory, or the Commonwealth of Puerto Rico and concealed this failure while occupying a position that required bar membership. The investigation determined that the individual, who was hired as an attorney in 1979 and joined the SES in 1991, was classified as a general attorney throughout the individual's employment at the EPA and thus should have maintained active bar membership the entire time.

"Phishing" Computer Intrusion Attacks

On September 23, 2020, Olumide Ogunremi was sentenced to 36 months of incarceration, followed by 24 months supervised release, and ordered to pay \$68,618.41 in restitution. From 2012 through 2014, more than 1,700 EPA employees were subjects of repeated "phishing" computer intrusion attacks by Ogunremi and his coconspirators. Using the employees' hacked email accounts, Ogunremi and his coconspirators fraudulently purchased hundreds of thousands of dollars of office supplies from U.S. General Services Administration vendors with stolen credit card information. In February 2018, Ogunremi was scheduled to plead guilty but instead fled the United States. In April 2019, Ogunremi was located and arrested in Toronto, Canada. After being extradited to the United States, Ogunremi pleaded guilty on February 20, 2020, in the U.S. District Court for the District of New Jersey to conspiracy to commit wire fraud, 18 U.S.C. § 1349. The total amount of fraud perpetrated by the group totaled well over \$3.2 million.

This case was worked jointly with the General Services Administration OIG, Department of Commerce OIG, Defense Criminal Investigative Service, and Federal Bureau of Investigation.

Company President Sentenced

On September 25, 2020, Aaron Jamison, president of Micah Group LLC and Micah Group Environmental Contractors, was sentenced to 36 months of incarceration, followed by three years of supervised release, and ordered to pay restitution in the amount of

\$640,638.31. In 2012, the EPA awarded Micah Group Energy and Environmental a \$4,389,144.24 contract for soil remediation in Treece, Kansas. Jamison signed vouchers certifying that all subcontractors and suppliers received timely payment for their work. The investigation disclosed that the subcontractors were not paid until several years later and were not paid the amount billed to the EPA. Additionally, Jamison falsely certified and submitted state-required documents under the Underground Storage Tank program. On January 22, 2020, Jamison pleaded guilty to theft from an employee benefit plan, 18 U.S.C. § 664; conspiracy to commit mail fraud, 18 U.S.C. § 371; and unlawful storage of hazardous waste, 42 U.S.C. § 6928(d)(2)(A). Also, on December 20, 2019, Mark Stafford, a former Micah Group employee, pleaded guilty to conspiracy to commit mail fraud, 18 U.S.C. § 371.

This case was worked jointly with the U.S. Department of Labor OIG, the EPA’s Criminal Investigation Division, and the United States Secret Service.

Reports of Investigation—Employee Integrity

A Report of Investigation documents the facts and findings of an OIG investigation and generally involves an employee integrity matter. When the OIG’s Office of Investigations issues a Report of Investigation that has at least one “supported” allegation, it requests that the entity receiving the report—whether it is an office within the EPA, the CSB, or the OIG—provide a notification to the OIG within 60 days regarding the administrative action taken or proposed to be taken in the matter. This section provides information on how many Reports of Investigation with at least one supported allegation were issued to the EPA, the CSB, or the OIG, as well as how many of those Reports of Investigation did not receive a response within the 60-day period.

For the reporting period ending September 30, 2020, the Office of Investigations issued two Reports of Investigation and received no responses outside the 60-day window:

Agency and OIG Reports of Investigation

Number of Reports of Investigation issued during reporting period with findings	Agency response* received after 60 days	Awaiting Agency response	OIG response* received after 60 days	Awaiting OIG response
2	0	0	0	0

* Agency or the OIG will or will not take an action or will conduct a supplemental investigation.

Hotline Activities

The Inspector General Act of 1978, as amended, requires each OIG to manage a hotline. The purpose of the hotline is to receive complaints of fraud, waste, or abuse in EPA and CSB programs and operations, including mismanagement or violations of law, rules, or regulations by Agency employees or program participants. The hotline also encourages suggestions for assessing the efficiency and effectiveness of Agency programs. Complaints and requests may be submitted by anyone, including EPA and CSB employees, participants in EPA and CSB programs, Congress, organizations, and the public. As a result of these contacts, the OIG may conduct audits, evaluations, and investigations.

Reports Initiated via OIG Hotline

EPA's Lack of Oversight Resulted in Serious Issues Related to an Office of Water Contract, Including Potential Misallocation of Funds

Report No. [20-P-0331](#), issued September 25, 2020



Operating efficiently and effectively



Complying with key internal control requirements (policies and procedures)

The EPA's management of Contract No. EP-C-16-001, which the Agency awarded to Northbridge Group in December 2015 for support services for the Office of Water, lacked sufficient controls. The EPA potentially misallocated at least \$639,220 in paid invoices without input from the appropriate EPA staff and did not conduct the required records inspections. If the EPA had performed detailed reviews of invoices, it could have potentially saved up to \$565,529 on direct labor and associated overhead over three years. The EPA also violated the Inspector General Act of 1978, as amended, by destroying documents after the OIG requested them. The Agency agreed with four of our recommendations and disagreed with two. It did not provide acceptable corrective actions for one of the agreed-to recommendations. Three recommendations are unresolved with resolution efforts in progress.

Examples of potentially misallocated funds identified during our analysis*

Amount	Potential misallocation
\$129,950.00	The Office of Water may owe these funds to Region 9 because of a reconciliation error and unused funds.
\$248,010.00	Hawaii may owe these funds to the Office of Water because Office of Water funds were used to pay for Hawaii Loan and Grant Tracking System work that exceeded the amount funded by Region 9.
\$244,460.31	The Office of Water may owe these funds to California because California funds were used to pay Hawaii Loan and Grant Tracking System work assignment costs.
\$16,799.69	The Office of Water may owe these unspent funds to Region 9.
\$639,220.00	Total potential misallocations

Source: OIG analysis of EPA email records. (EPA OIG table)

* Our analysis was not able or intended to be all-inclusive so other misallocated funds may exist.

Management Alert: EPA Region 5 Needs to Implement Effective Internal Controls to Strengthen Its Records Management Program

Report No. [20-E-0295](#), issued August 31, 2020



Operating efficiently and effectively

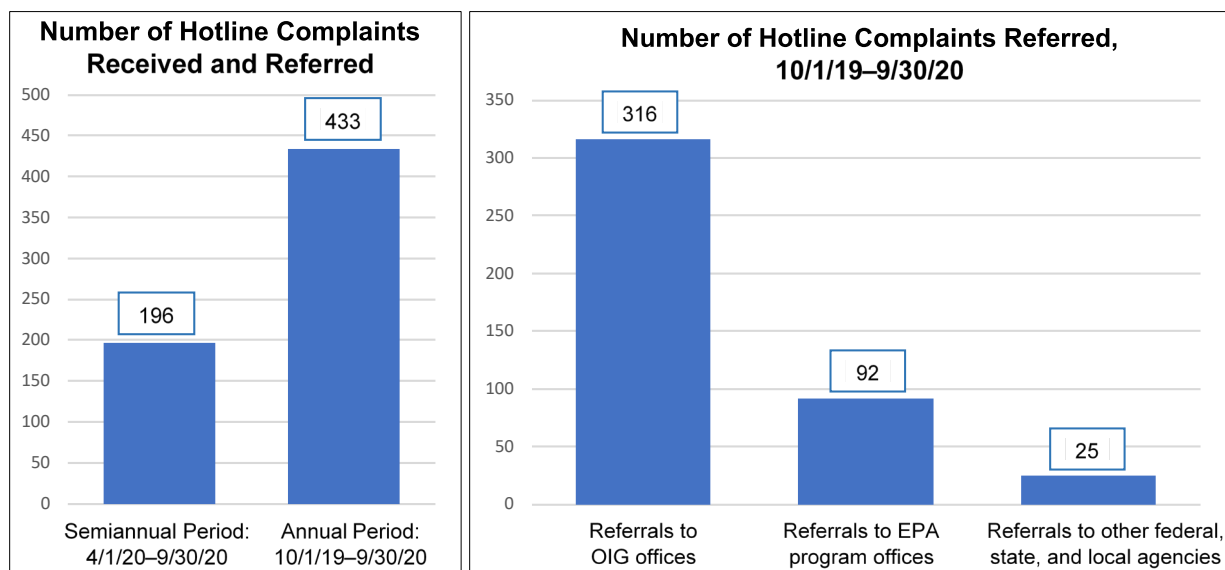


Complying with key internal control requirements (policy and procedures)

An EPA OIG Hotline complaint submitted in May 2019 alleged that thousands of electronic files were lost during an attempt to migrate files to the Agency's cloud file storage system. Region 5 did not know whether electronic files that contained records or information subject to litigation holds were lost. In addition, Region 5 did not require employees to take training on the cloud file storage system, nor did it communicate the suspected loss of potential records to the agency records officer in a timely manner. We recommended that Region 5 implement internal controls to verify that records are maintained in the EPA's official recordkeeping system and that training on new technology systems is tracked. We also recommended that the EPA update Agency records management policy, procedures, and guidance. The EPA agreed with our six recommendations and has completed three.

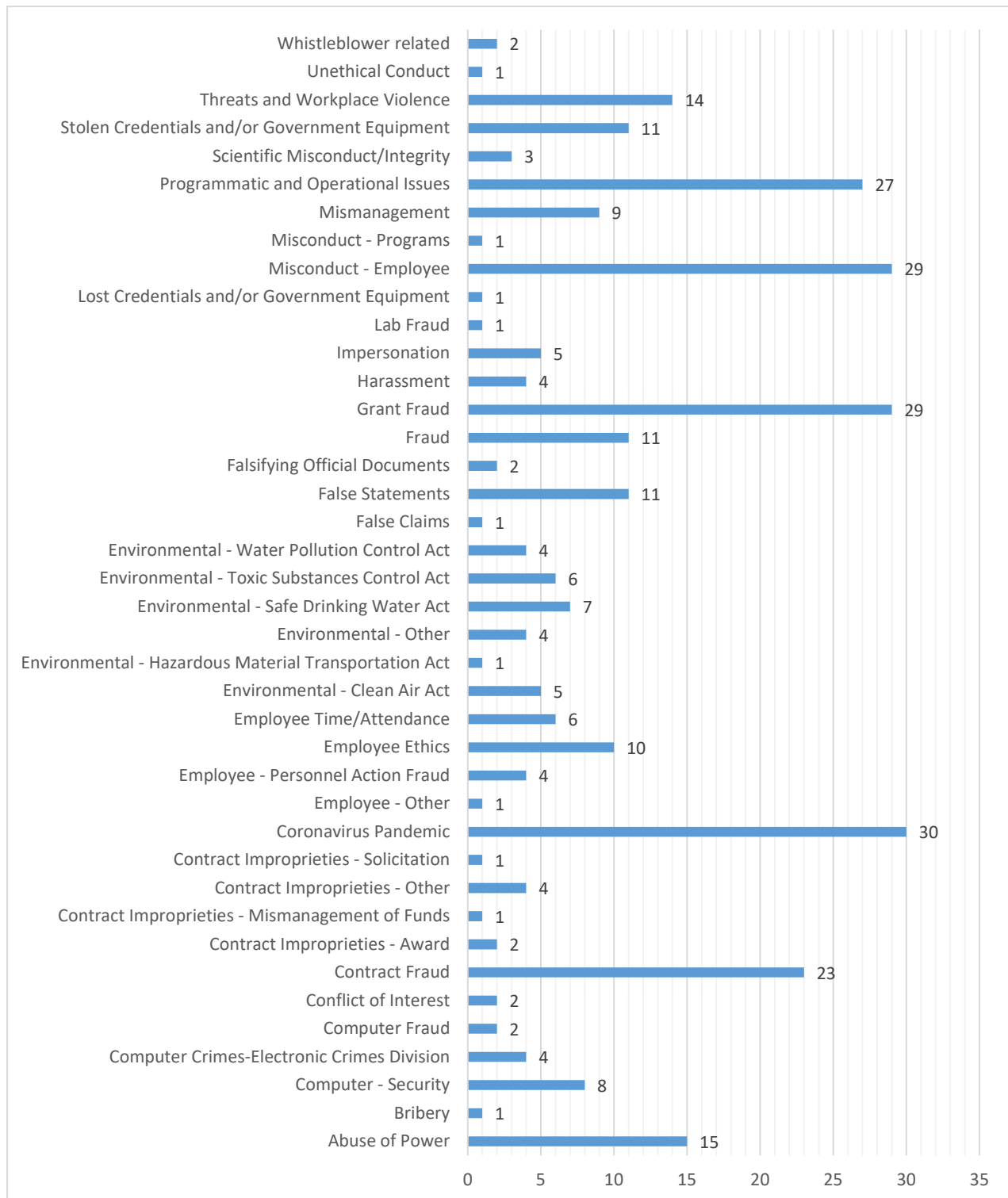
Hotline Statistics

The OIG Hotline receives complaints of fraud, waste, abuse, mismanagement, and misconduct in EPA and CSB programs and operations. The figures below detail the number and type of complaints that the hotline received and referred for review by OIG investigation, audit, and evaluation staff; EPA program offices; and other government agencies during FY 2020.



Note: Hotline complaints may be referred to more than one entity, so the number of referrals made to individual entities may be higher than the total number of complaints referred.

Categories of hotline complaints referred to OIG offices



Hotline Confidentiality

Individuals who contact the hotline are not required to identify themselves and may request confidentiality when submitting allegations. However, the OIG encourages those who report allegations to identify themselves so that they can be contacted if the OIG has additional questions. Pursuant to Section 7 of the Inspector General Act, the OIG will not disclose the identity of an EPA or CSB employee who provides information unless that employee consents or the inspector general determines that such disclosure is unavoidable during the course of an investigation. As a matter of policy, the OIG will provide comparable protection to employees of contractors, grantees, and others who provide information to the OIG and request confidentiality. Individuals concerned about the confidentiality or anonymity of electronic communication may submit allegations by telephone or regular mail.

EPA OIG Hotline

To report fraud, waste, or abuse, contact us through one of the following methods:

Email: OIG_Hotline@epa.gov
Phone: (888) 546-8740 or (202) 566-2476
Fax: (202) 566-0814
Online: [EPA OIG Hotline](#)

Mail: EPA OIG Hotline
1200 Pennsylvania Avenue, NW
Mail Code 2431T
Washington, DC 20460

EPA Whistleblower Protection Coordinator

The EPA whistleblower protection coordinator can be reached at:

Phone: (202) 566-1513


Email: whistleblower_protection@epa.gov

U.S. Chemical Safety and Hazard Investigation Board

The CSB was created by the Clean Air Act Amendments of 1990. The CSB's mission is to investigate accidental chemical releases at facilities, report the root causes to the public, and recommend measures to prevent future occurrences. In FY 2004, Congress designated the EPA inspector general to serve as the inspector general for the CSB. As a result, the EPA OIG has the responsibility to audit, evaluate, inspect, and investigate the CSB's programs and to review proposed laws and regulations to determine their potential impact on the CSB's programs and operations. Details on our work involving the CSB are available on this OIG [webpage](#).

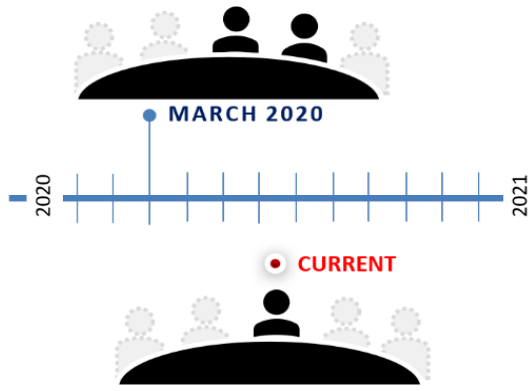


Fiscal Year 2020 U.S. Chemical Safety and Hazard Investigation Board Management Challenges

Report No. [20-N-0218](#), issued July 6, 2020 

We maintained the two management challenges from FY 2019 and identified a new management challenge:


- New board members must be nominated and confirmed (continuing).* The five-member CSB had four vacancies as of September 30, 2020. Having only one member impairs the function of the CSB, as all functions rest with that one member.


- Policy must be developed for board member responsibilities (continuing).* According to the CSB general counsel, the board decided that a Senate-confirmed chairperson should approve any new policy. A new chairperson was confirmed in March 2020, but a policy had not been developed as of June 2020.

The Clean Air Act provides for five CSB board members, but as of June 2020, the board consisted of only the chairperson. (EPA OIG image)
- Operations must continue during the coronavirus pandemic (new).* The CSB must rely on its internal controls to continue operations to the extent practicable and to safely return employees to work at CSB facilities.

Other Activity

Internal Quality Assurance Review of EPA OIG Audit Assignments Completed in Fiscal Year 2019

Report No. [20-N-0230](#), issued July 16, 2020 

Internal compliance reviews of EPA OIG audit assignments completed in FY 2019 found that the OIG complied with generally accepted government auditing standards and substantially complied with OIG policies and procedures. The only systemic issue we identified concerned the estimation and approval of audit and evaluation time frames and cost estimates. We also found that the OIG should ensure that all training records are adequately documented and that reports include the required language when audits and evaluations are not conducted in accordance with generally accepted government auditing standards. Because the OIG implemented corrective actions to address our findings in October 2019, we made no recommendations. We will assess these corrective actions during our FY 2020 internal quality assurance review.

Other Results of OIG Work

Follow-Up Is an Important Aspect of OIG Efforts

It is important for the OIG to follow up on certain previously issued reports to ensure that appropriate and effective corrective actions have been taken. The following reports issued during the semiannual reporting period ending September 30, 2020, involved follow-up on prior OIG reports.

Report number	Report title	Date issued
20-F-0135	Fiscal Years 2018 and 2017 Financial Statements for the Pesticide Registration Fund	4/14/20
20-P-0167	EPA Complied with Improper Payments Legislation, but Internal Controls Need Substantial Improvement to Ensure More Accurate Reporting	5/13/20
20-P-0170	EPA Needs to Conduct Risk Assessments When Designing and Implementing Programs	5/18/20
20-P-0173	Further Efforts Needed to Uphold Scientific Integrity Policy at EPA	5/20/20
20-F-0184	Fiscal Years 2018 and 2017 Financial Statements for the Pesticides Reregistration and Expedited Processing Fund	6/1/20
20-P-0194	EPA's Office of the Chief Financial Officer Lacks Authority to Make Decisions on Employee-Debt Waiver Requests	6/15/20
20-P-0203	EPA's Safer Choice Program Would Benefit from Formal Goals and Additional Oversight	6/30/20
20-P-0204	EPA Needs to Improve Oversight of Research Assistance Agreements	6/30/20
20-N-0231	EPA's FYs 2020–2021 Top Management Challenges	7/21/20
20-F-0244	EPA's Fiscal Years 2018 and 2017 Hazardous Waste Electronic Manifest System Fund Financial Statements	8/10/20
20-E-0246	EPA's 2018 BEACH Act Report to Congress Does Not Fully Meet Statutory Requirements	8/13/20
20-P-0247	Lack of Planning Risks EPA's Ability to Meet Toxic Substances Control Act Deadlines	8/17/20
20-F-0308	Fiscal Years 2019 and 2018 Financial Statements for the Pesticides Reregistration and Expedited Processing Fund	9/8/20
20-E-0309	EPA Needs to Improve Processes for Securing Region 8's Local Area Network	9/10/20
20-F-0328	Fiscal Years 2019 and 2018 Financial Statements for the Pesticide Registration Fund	9/23/20
20-P-0331	EPA's Lack of Oversight Resulted in Serious Issues Related to an Office of Water Contract, Including Potential Misallocation of Funds	9/25/20
20-P-0335	Regions 1 and 5 Need to Require Tribes to Submit More Detailed Work Plans for Grants	9/29/20
20-P-0337	Data Used for Annual Toxics Release Inventory National Analysis Are 99 Percent Complete, but EPA Could Improve Certain Data Controls	9/30/20

Single Audit Reporting Efforts Make Impact

In accordance with the Single Audit Act of 1984 and Office of Management and Budget guidance, nonfederal entities that expend more than \$750,000 in federal funds are required to have a comprehensive annual audit of their financial statements and comply with major federal program requirements. The entities receiving the funds include states, local governments, tribes, and nonprofit organizations. The Act provides that grantees are to be subject to one annual comprehensive audit of all their federal programs versus a separate audit of each federal program—hence the term “single audit.” The single audits are performed by private firms. Federal agencies rely upon the results of single audit reporting when performing their grants management oversight of these entities.

The OIG provides an important service to the EPA by performing technical reviews of single audit reports, for which the OIG issues memorandums for audit resolution and corrective action. These memorandums recommend that EPA action officials confirm that corrective actions have been taken. If the corrective actions have not been implemented, the EPA needs to obtain a corrective action plan, with milestone dates, for addressing the findings in a single report. The following is a summary of single audit reporting actions during the semiannual reporting period ending September 30, 2020.

Summary of single audit activity in FY 2020

	April 1, 2020– September 30, 2020	Total for FY 2020
Number of single audit memorandums issued to EPA	169	276
Number of single audit findings reported to EPA	265	699
Questioned costs reported to EPA	\$1,150,644	\$1,351,674
Number of quality reviews of single audit reports done by OIG	2	7
Deficiency letters issued to single auditors by OIG	2	4

Source: EPA OIG analysis. (EPA OIG table)

The OIG also provides technical assistance and advice to the EPA, external auditors who perform single audits, and others involved with the single audit process.

Agency Best Practices

During this semiannual reporting period, OIG reports highlighted Agency best practices that have potential value and applicability to other components in the EPA or elsewhere:

- Data about toxic chemicals that were submitted late for the EPA’s Toxics Release Inventory National Analysis accounted for an average of less than one-half of 1 percent of the releases reported in the data we reviewed. One reason for the low percentage is that the Agency followed up with prior-year reporters who had not yet reported in the current year before freezing the data. (Report No. [20-P-0337](#))
- In addition to ensuring that work plan requirements are met for the Fond du Lac Band Tribe, Region 5’s Tribal & Multi-media Programs Office is committed to regularly educating all grantees on grant rules and requirements. A training planned in March 2020 about work plan component costs was cancelled due to the coronavirus pandemic but will be rescheduled in FY 2021. (Report No. [20-P-0335](#))
- The Agency took some initial measures to protect its on-scene coordinators during the coronavirus pandemic. For example, starting in March 2020, the EPA began adjusting its operations by reviewing its ongoing and time-critical emergency responses and delaying responses when possible to do so without further detriment to public health or the environment. (Report No. [20-E-0332](#))
- In July 2019, the Agency issued a swimming season report, EPA-820-F-19-002, which covered the 2018 swimming season. Although not mandated by the Beaches Environmental Assessment and Coastal Health Act of 2000 and not regularly produced by the EPA, these swimming season reports summarize information about relevant beach activity that has been reported to the EPA. For example, states, territories, and tribes with coastal and Great Lakes beaches report any beach closings and advisories to the EPA. (Report No. [20-E-0246](#))
- Our review of the EPA’s plans to implement Section 3610 of the CARES Act, found that the Office of Acquisition Solutions created and provided detailed guidance to EPA contracting personnel and contractors related to reimbursements under Section 3610. Two Office of Acquisition Solutions–issued guidance documents—the Implementation Plan and the Contractor Supplemental Invoice Instructions—specifically capture the purpose of and implementation steps for Section 3610. (Report No. [20-N-0202](#))

- During this semiannual reporting period, the Agency proactively corrected some OIG-identified issues before we issued the associated reports:
 - The EPA agreed to update, during our audit period, the accounting posting models for receivables and earned revenue. The estimated completion date for the improper recordings corrective actions is September 30, 2021. The EPA corrected the misclassified fees during the audit. We originally reported on these findings in OIG Report No. 20-F-0033, *EPA's Fiscal Years 2019 and 2018 (Restated) Consolidated Financial Statements*, issued November 19, 2019. (Report No. [20-F-0244](#))
 - The Agency agreed to revise, during our audit period, its guidance to address the need to conduct program-level risk assessments for new and existing programs. The EPA issued revised guidance in February 2020. (Report No. [20-P-0170](#))

Scientific Integrity and Misconduct Issues

Scientific integrity at the EPA helps ensure that the development and use of science in the Agency’s decision-making is of the highest quality. Scientific integrity is crucial because it helps to safeguard objective science that is free from bias, fabrication, falsification, plagiarism, outside interference, and suppression. The EPA issued its Scientific Integrity Policy in February 2012. The Policy sets the expectation that all EPA employees will adhere to the terms of the Policy, including reporting Policy breaches. In addition, the EPA has a Scientific Integrity Program, which consists of the Agency’s scientific integrity official, deputy scientific integrity officials from each of the Agency’s program and regional offices, and program staff that support implementing the Scientific Integrity Policy.

“Science is the backbone of the EPA’s decision-making. The Agency’s ability to pursue its mission to protect human health and the environment depends upon the integrity of the science on which it relies. The environmental policies, decisions, guidance, and regulations that impact the lives of all Americans every day must be grounded, at a most fundamental level, in sound, high quality science.”

—[EPA Scientific Integrity Policy](#), Section II

As part of its mission to detect and deter waste, fraud, abuse, and mismanagement, the EPA OIG conducts investigations related to “research misconduct” or “scientific misconduct.” Scientific misconduct includes, among other things, fabrication, falsification, or plagiarism. [EPA Order 3120.5](#) contains the Agency’s policy and procedures for addressing research misconduct, including when to notify the OIG of potential misconduct. In addition, the OIG may refer various scientific integrity allegations that it receives to the scientific integrity official. With certain exceptions, the OIG has, through [coordination procedures](#), delegated the initial investigation of scientific misconduct allegations involving plagiarism to the scientific integrity official. The scientific integrity official and the OIG meet quarterly to discuss the status of cases.

This section reports the status of scientific integrity allegations received by the scientific integrity official and any scientific misconduct cases received by the OIG.

Scientific Integrity Allegations

The Scientific Integrity Program allegation process contains two paths: (1) advice and assistance and (2) a procedure for reporting and adjudicating allegations. The purpose of advice and assistance is to avert allegations by addressing issues early with minimal senior-level involvement. Someone with a scientific integrity concern can receive advice from the Scientific Integrity Program to ascertain whether the issue concerns scientific integrity and to address the issue before it rises to the level of an allegation. If an

allegation is reported, the Scientific Integrity Program conducts an initial screening to determine whether the allegation is covered under the Policy. This initial screening may then be followed by a preliminary inquiry to gather additional facts. If needed, the scientific integrity official can convene a review panel with the deputy scientific integrity officials to determine whether a violation has occurred and to recommend corrective scientific actions and preventive measures.

Trends in Scientific Integrity Inquiries Received by the Scientific Integrity Official

Scientific integrity inquiries by topic since Scientific Integrity Policy inception

Category	Total inquiries received by the scientific integrity official from FY 2012 (Policy inception) to September 30, 2020	
	Percentage (number) of formal allegations	Percentage (number) of inquiries for advice
Authorship	16% (16)	10% (24)
Data quality	8% (8)	8% (18)
Delay/Suppression	16% (16)	20% (46)
Interference	33% (33)	44% (103)
Plagiarism	3% (3)	1% (2)
Other	13% (13)	11% (25)
Not scientific integrity	10% (10)	7% (17)
TOTAL	99 allegations	235 inquiries

Source: EPA. (EPA OIG table)

Note: Percentages in this table were rounded.

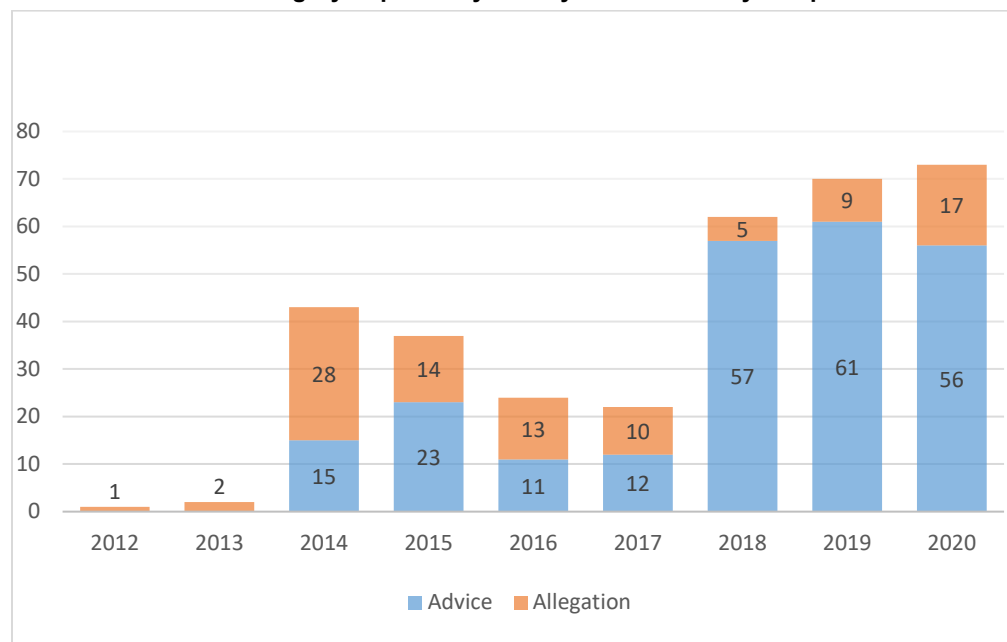
Scientific integrity inquiries by topic during semiannual reporting period ending September 30, 2020

Category	Received by the scientific integrity official during semiannual reporting period ending September 30, 2020	
	Percentage (number) of formal allegations	Percentage (number) of inquiries for advice
Authorship	25% (1)	9% (2)
Data quality	-	9% (2)
Delay/Suppression	-	9% (2)
Interference	75% (3)	55% (12)
Plagiarism	-	5% (1)
Other	-	-
Not scientific integrity	-	14% (3)
TOTAL	4 allegations	22 inquiries

Source: EPA. (EPA OIG table)

Note: Percentages in this table were rounded.

Number of scientific integrity inquiries by fiscal year since Policy inception



Source: EPA. (EPA OIG table)

Status of Scientific Integrity Inquiries Received by the Scientific Integrity Official

For the semiannual reporting period ending September 30, 2020, the scientific integrity official received four new allegations and 22 new requests for advice. During the semiannual reporting period ending September 30, 2020, four allegations were closed or resolved, including one that was received in this reporting period. Of the four allegations that were closed or resolved in this reporting period, two were authorship disputes that were not substantiated, one was closed due to the submitter failing to provide additional information, and one was closed due to pending litigation.

There are currently 17 open allegations (14 from prior reporting periods and three from the current reporting period). All but one of the 17 remaining open allegations deal with high-profile issues or senior officials. As recommended in the OIG’s May 2020 audit report, the Scientific Integrity Program is currently in the process of developing procedures to address these types of allegations.

Status of requests for advice for semiannual reporting period ending September 30, 2020

Status	Number as of September 30, 2020
Converted to allegation	2
Not scientific integrity	4
Other advice provided	16
TOTAL	22

Source: EPA. (EPA OIG table)

Status of allegations for semiannual reporting period ending September 30, 2020

Status	Number as of September 30, 2020
Open/Active*	17
Closed – substantiated	0
Closed – not substantiated**	4
Withdrawn	0
Transferred to OIG	0
Not scientific integrity	0

Source: EPA. (EPA OIG table)

* This number includes the total open/active allegations remaining from the current and previous reporting periods.

** This number includes only the allegations closed during this reporting period. Not all closed allegations were received this reporting period. One allegation was closed due to pending litigation.

The Scientific Integrity Program also publishes an annual report, which includes status statistics and summarized resolution information. The latest annual report can be found on the EPA’s Scientific Integrity Program [website](#).

Scientific Misconduct Allegations Received by OIG

For the semiannual reporting period ending September 30, 2020, the OIG received no allegations involving potential scientific misconduct. The OIG has two open allegations involving potential scientific misconduct that it is investigating.

The OIG had no results of investigations that it conducted or oversaw to report to the Agency for a determination of appropriate action. The OIG had no results of investigations that it conducted involving criminal misconduct to refer to the Department of Justice, pursuant to the Inspector General Act of 1978, as amended.

Statistical Data

Profile of Activities and Results

OIG audits and evaluations ^a		
(\$ in millions)		
	April 1, 2020– September 30, 2020	FY 2020
Questioned costs ^b	\$0.224	\$1.375
Potential monetary benefits ^c	\$21.126	\$80.564
Audit and evaluation reports issued by OIG ^d	28	50

^a Section 5(a)(22) requires detailed descriptions of the particular circumstances of each inspection, evaluation, and audit conducted by the OIG that was closed and not publicly disclosed. There were no instances of inspections, evaluations, or audits that were closed and not publicly disclosed during the semiannual period ending September 30, 2020. Investigations involving senior employees that were closed during this semiannual reporting period are in Appendix 4.

^b This measure includes single audits, which are audits of nonfederal entities performed by private firms.

^c This measure includes potential monetary benefits identified in reports and monetary actions taken or resolved prior to report issuance.

^d This measure includes performance and financial audits conducted in accordance with generally accepted government auditing standards, as well as evaluations conducted in accordance with the *Quality Standards of Inspection and Evaluation*. Appendix 1 lists all reports issued.

Investigative operations						
(\$ in millions)						
	April 1, 2020–September 30, 2020			FY 2020		
	EPA OIG only	Joint*	Total	EPA OIG only	Joint*	Total
Total fines and recoveries	\$0.008	\$0.710	\$0.718	\$0.040	\$0.710	\$0.750
Cost savings	\$0.059	\$0.000	\$0.059	\$0.436	\$0.085	\$0.521
Civil settlements	\$0.000	\$0.000	\$0.000	\$0.000	\$0.000	\$0.000
Cases opened during period	52	36	88	105	46	151
Cases closed during period	46	13	59	102	27	129
Indictments/informations/complaints	1	6	7	1	11	12
Convictions	0	1	1	0	4	4
Civil judgments/settlements/filings	0	0	0	0	0	0

* With one or more federal agencies.

Audit Report Resolution

Table 1: OIG-issued reports with questioned costs for semiannual period ending September 30, 2020 (\$ in thousands)

Report category	Number of reports	Questioned costs*	Unsupported costs
A. For which no management decision was made by April 1, 2020**	11	\$230	\$0
B. New reports issued during period	32	23	21
Subtotals (A + B)	43	\$253	\$21
C. For which a management decision was made during the reporting period:	27		
(i) Dollar value of disallowed costs		\$0	\$0
(ii) Dollar value of costs not disallowed		0	0
D. For which no management decision was made by September 30, 2020	16	\$253	\$21

* Questioned costs include unsupported costs.

** Any difference in the number of reports and the amounts of questioned costs between this report and our previous semiannual report results from corrections made to data in our audit tracking system.

Table 2: OIG-issued reports with recommendations that funds be put to better use for semiannual period ending September 30, 2020 (\$ in thousands)

Report category	Number of reports	Funds to put to better use
A. For which no management decision was made by April 1, 2020*	11	\$49,803
B. New reports issued during the reporting period	32	21,149
Subtotals (A + B)	43	\$70,952
C. For which a management decision was made during the reporting period:	27	
(i) Dollar value of recommendations from reports that were agreed to by management		\$29,431
(ii) Dollar value of recommendations from reports that were not agreed to by management		0
D. For which no management decision was made by September 30, 2020	16	\$41,521

* Any difference in the number of reports and the amounts of funds put to better use between this report and our previous semiannual report results from corrections made to data in our audit tracking system.

Summary of Investigative Results

Summary of investigative activity for semiannual period ending September 30, 2020

Cases open as of April 1, 2020	135
Cases opened during period	88
Cases closed during period	59
Cases open as of September 30, 2020	164
Complaints	
Complaints open as of April 1, 2020*	19
Complaints opened during period	72
Complaints closed during period	86
Complaints open as of September 30, 2020	5

* Adjusted from prior period.

Results of prosecutive actions

	EPA OIG only	Joint*	Total
Criminal indictments/informations/complaints**	1	6	7
Convictions	0	1	1
Civil judgments/settlements/filings	0	0	0
Criminal fines and recoveries	\$0	\$709,556	\$709,556
Civil recoveries	\$0	\$0	\$0
Prison time	0 months	72 months	72 months
Prison time suspended	0 months	0 months	0 months
Home detention	0 months	0 months	0 months
Probation	0 months	60 months	60 months
Community service	0 hours	0 hours	0 hours

* With one or more federal agencies.

** Sealed indictments are not included in this category.

Administrative actions

	EPA OIG only	Joint*	Total
Suspensions	0	5	5
Debarments	2	4	6
Other administrative actions	20	7	27
Total	22	16	38
Administrative recoveries	\$8,429	\$0	\$8,429
Cost savings	\$58,828	\$0	\$58,828

* With one or more federal agencies.

Summary of investigative reports issued and referrals for prosecution*

Number of investigative reports issued**	3
Number of persons referred to U.S. Department of Justice for criminal prosecution	28
Number of persons referred to state and local authorities for criminal prosecution	7
Number of criminal indictments and informations resulting from any prior referrals to prosecutive authorities	0

* Investigative reports comprise final, interim, and supplemental Reports of Investigation, as well as Final Summary Reports.

** Reports of Investigation issued may differ from the numbers reported in the Reports of Investigation section. In calculating the number of referrals, corporate entities were counted as “persons.”

Employee integrity cases*

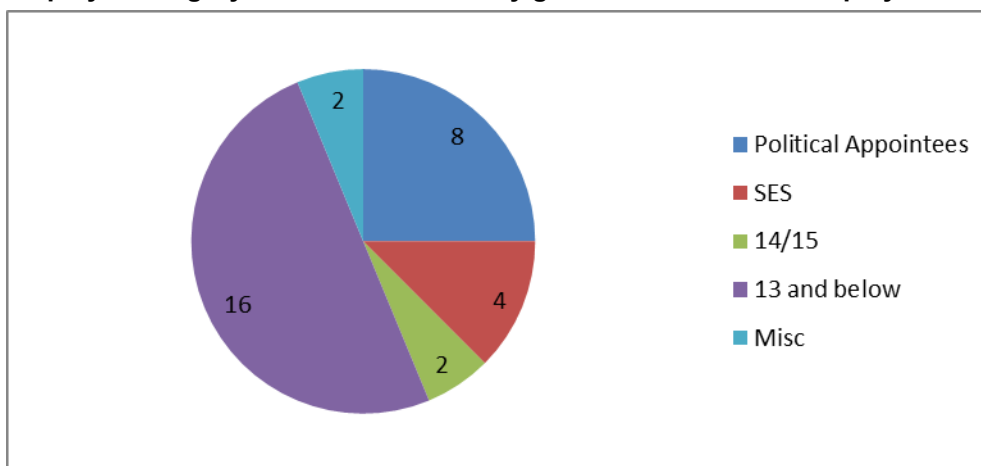
	Political appointees	SES	GS-14/15	GS-13 and below	Misc.	Total
Pending as of April 1, 2020	8	4	9	26	3	50
Opened*	0	2	0	3	0	5
Closed*	0	2	6	12	0	20
Pending as of September 30, 2020 **	8	4	2	16	2	32

* Employee integrity investigations involve allegations of criminal activity or serious misconduct by Agency employees that could threaten the credibility of the Agency, the validity of executive decisions, the security of personnel or business information entrusted to the Agency, or financial loss to the Agency (such as abuse of government bank cards or theft of Agency funds). Allegations against former employees are included under “Misc.”

** Pending numbers as of September 30, 2020, may not add up due to investigative developments resulting in subjects being added or changed.

The chart below provides a breakdown by grade and number of employees who are the subject of employee integrity investigations.

Employee integrity cases: Breakdown by grade and number of employees



Appendices

Appendix 1—Reports Issued

Section 5(a)(6) of the Inspector General Act of 1978, as amended, requires a listing, subdivided according to subject matter, of each report issued by the OIG during the reporting period. For each report, where applicable, the Inspector General Act also requires a listing of the dollar value of questioned costs and the dollar value of recommendations that funds be put to better use.

Report number	Report title	Date	Questioned costs			Potential monetary benefits
			Ineligible	Unsupported	Unreasonable	
EVALUATIONS IN ACCORDANCE WITH QUALITY STANDARDS FOR INSPECTION AND EVALUATION						
20-E-0169	EPA Oversight Provided Reasonable Controls to Deter and Minimize Trespassing at the Fort Ord Superfund Site	5/14/20	\$0.00	\$0.00	\$0.00	\$0.00
20-E-0177	EPA Toxic Substances Control Act Consent Orders Need Better Coordination	5/28/20	0.00	0.00	0.00	0.00
20-E-0246	EPA's 2018 BEACH Act Report to Congress Does Not Fully Meet Statutory Requirements	8/13/20	0.00	0.00	0.00	0.00
20-E-0295	Management Alert: EPA Region 5 Needs to Implement Effective Internal Controls to Strengthen Its Records Management Program	8/31/20	0.00	0.00	0.00	0.00
20-E-0309	EPA Needs to Improve Processes for Securing Region 8's Local Area Network	9/10/20	0.00	0.00	0.00	11,477,250.00
20-E-0332	EPA Has Sufficiently Managed Emergency Responses During the Pandemic but Needs to Procure More Supplies and Clarify Guidance	9/28/20	0.00	0.00	0.00	0.00
20-E-0333	Improved EPA Oversight of Funding Recipients' Title VI Programs Could Prevent Discrimination	9/28/20	0.00	0.00	0.00	0.00
SUBTOTAL = 7			\$0.00	\$0.00	\$0.00	\$11,477,250.00
FINANCIAL AUDITS IN ACCORDANCE WITH GENERALLY ACCEPTED GOVERNMENT AUDITING STANDARDS						
20-F-0135	Fiscal Years 2018 and 2017 Financial Statements for the Pesticide Registration Fund	4/14/20	\$0.00	\$0.00	\$0.00	\$0.00
20-F-0184	Fiscal Years 2018 and 2017 Financial Statements for the Pesticides Reregistration and Expedited Processing Fund	6/1/20	0.00	0.00	0.00	0.00
20-F-0244	EPA's Fiscal Years 2018 and 2017 Hazardous Waste Electronic Manifest System Fund Financial Statements	8/10/20	0.00	0.00	0.00	0.00
20-F-0308	Fiscal Years 2019 and 2018 Financial Statements for the Pesticides Reregistration and Expedited Processing Fund	9/8/20	0.00	0.00	0.00	0.00
20-F-0328	Fiscal Years 2019 and 2018 Financial Statements for the Pesticide Reregistration and Expedited Processing Fund	9/23/20	0.00	0.00	0.00	0.00
20-F-0342	Audit of EPA's Toxic Substances Control Act Service Fee Fund Financial Statements for the Period from Inception (June 22, 2016) through September 30, 2018	9/30/20	0.00	0.00	0.00	8,418,837.00
SUBTOTAL = 6			\$0.00	\$0.00	\$0.00	\$8,418,837.00
PERFORMANCE AUDITS IN ACCORDANCE WITH GENERALLY ACCEPTED GOVERNMENT AUDITING STANDARDS						
20-P-0134	EPA May Have Overpaid for Its \$13 Million Time and Attendance System by Not Following IT Investment Requirements	4/13/20	\$0.00	\$0.00	\$0.00	\$1,200,000.00
20-P-0146	EPA's Processing Times for New Source Air Permits In Indian Country Have Improved but Many Still Exceed Regulatory Time Frames	4/22/20	0.00	0.00	0.00	0.00
20-P-0167	EPA Complied with Improper Payments Legislation, but Internal Controls Need Substantial Improvement to Ensure More Accurate Reporting	5/13/20	0.00	0.00	0.00	0.00

Report number	Report title	Date	Questioned costs			Potential monetary benefits
			Ineligible	Unsupported	Unreasonable	
20-P-0170	EPA Needs to Conduct Risk Assessments When Designing and Implementing Programs	5/18/20	0.00	0.00	0.00	0.00
20-P-0173	Further Efforts Needed to Uphold Scientific Integrity Policy at EPA	5/20/20	0.00	0.00	0.00	0.00
20-P-0194	EPA's Office of the Chief Financial Officer Lacks Authority to Make Decisions on Employee-Debt Waiver Requests	6/15/20	0.00	0.00	0.00	29,608.00
20-P-0200	EPA Needs to Address Internal Control Deficiencies in the Agencywide Quality System	6/22/20	0.00	0.00	0.00	0.00
20-P-0203	EPA's Safer Choice Program Would Benefit from Formal Goals and Additional Oversight	6/30/20	0.00	0.00	0.00	0.00
20-P-0204	EPA Needs to Improve Oversight of Research Assistance Agreements	6/30/20	0.00	0.00	0.00	0.00
20-P-0236	EPA Needs to Improve Oversight of How States Implement Air Emissions Regulations for Municipal Solid Waste Landfills	7/30/20	0.00	0.00	0.00	0.00
20-P-0245	EPA Needs to Strengthen Controls Over Required Documentation for and Tracking of Intergovernmental Personnel Act Assignments	8/10/20	0.00	0.00	0.00	0.00
20-P-0247	Lack of Planning Risks EPA's Ability to Meet Toxic Substances Control Act Deadlines	8/17/20	0.00	0.00	0.00	0.00
20-P-0331	EPA's Lack of Oversight Resulted in Serious Issues Related to an Office of Water Contract, Including Potential Misallocation of Funds	9/25/20	0.00	0.00	0.00	0.00
20-P-0335	Regions 1 and 5 Need to Require Tribes to Submit More Detailed Work Plans for Grants	9/29/20	2,038.00	20,830.00	0.00	0.00
20-P-0337	Data Used for Annual Toxics Release Inventory Are 99 Percent Complete, but EPA Could Improve Certain Data Controls	9/30/20	0.00	0.00	0.00	0.00
SUBTOTAL = 15			\$2,038.00	\$20,830.00	\$0.00	\$1,229,608.00
PROJECTS NOT IN ACCORDANCE WITH GENERALLY ACCEPTED GOVERNMENT AUDITING STANDARDS OR QUALITY STANDARDS FOR INSPECTION AND EVALUATION						
20-N-0202	EPA's Initial Implementation of CARES Act Section 3610	6/29/20	\$0.00	\$0.00	\$0.00	\$0.00
20-N-0218	Fiscal Year 2020 U.S. Chemical Safety and Hazard Investigation Board Management Challenges	7/06/20	0.00	0.00	0.00	0.00
20-N-0230	Internal Quality Assurance Review of EPA OIG Audit Assignments Completed in Fiscal Year 2019	7/16/20	0.00	0.00	0.00	0.00
20-N-0231	EPA's FYs 2020-2021 Top Management Challenges	7/21/20	0.00	0.00	0.00	0.00
SUBTOTAL = 4			\$0.00	\$0.00	\$0.00	\$0.00
TOTAL REPORTS ISSUED = 32			\$2,038.00	\$20,830.00	\$0.00	\$21,125,695.00

Appendix 2—Reports Issued Without Management Decisions

For Reporting Period Ending September 30, 2020

Section 5(a)(10)(A) of the Inspector General Act of 1978, as amended, requires a summary of each audit, inspection, and evaluation report issued before the commencement of the reporting period for which no management decision had been made by the end of the reporting period, an explanation of the reasons such management decision had not been made, and a statement concerning the desired timetable for achieving a management decision on each such report. Office of Management and Budget Circular A-50 requires resolution within six months of a final report being issued. In this section, we report on audits and evaluations with no management decision or resolution within six months of final report issuance. In the summaries below, we provide the resolution status of management decisions not made as of September 30, 2020, which the OIG desires to resolve as soon as possible.

Section 5(a)(10)(B) of the Inspector General Act of 1978, as amended, requires a summary of each audit, inspection, and evaluation report issued during the reporting period for which no establishment comment was returned within 60 days of providing the report to the establishment. The literal language of Section 5(a)(10)(B) requests the OIG to track reports issued prior to commencement of the reporting period. However, given that this provision was intended to codify the February 27, 2015 semiannual requests from Senators Grassley and Johnson, the OIG interprets this provision to apply to reports within the semiannual period. There was one report for which we did not receive a response within 60 days during the semiannual period. We discuss this report in the “Reports for Which No Response Was Received Within 60 Days” section at the end of this appendix.

Office of Air and Radiation

Report No. [20-P-0047](#), *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*, December 5, 2019

Summary: The EPA did not comply with the requirements of Executive Orders 12866 and 13045 when developing and issuing the proposed Glider Repeal Rule. Additionally, the EPA did not follow its principal rulemaking guidance—the Action Development Process—in developing the proposed Glider Repeal Rule, nor did it meet Federal Records Act requirements. The proposed repeal rule would relieve industry of the compliance requirements of the Phase 2 rule, which set emissions standards and production limits for gliders beginning January 1, 2018. According to EPA managers and officials, the then-EPA administrator directed that the Glider Repeal Rule be promulgated as quickly as possible. Although EPA officials were aware that available information indicated the proposed Glider Repeal Rule was “economically significant,” the then-EPA administrator directed the Office of Air and Radiation to develop the proposed rule without conducting the analyses required by the executive orders for “economically significant” rules. The lack of analyses caused the public to not be informed during the public comment period of the proposed rule’s benefits, costs, potential alternatives, and impacts on children’s health. As of December 5, 2019, the proposed Glider Repeal Rule was listed on the EPA’s Fall 2019 Regulatory Agenda as “economically significant.”

We recommended that the Agency identify for the public the substantive changes to the proposed rule made at the suggestion or recommendation of the Office of Management and Budget’s Office of Information and Regulatory Affairs, conduct the required analyses prior to finalizing the repeal, provide the public a means to comment on the analyses supporting the rulemaking, and document the decisions made. The Agency provided sufficient planned corrective actions for two recommendations, while one recommendation remains unresolved.

Resolution Status: Resolution efforts are in progress for the remaining unresolved recommendation.

Office of Enforcement and Compliance Assurance

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

Summary: The Protective Service Detail for the EPA administrator had no approved standard operating procedures to address the level of protection required for the administrator or how those services were to be provided. As a result, the detail incurred over \$3.5 million in costs from February 1, 2017, through December 31, 2017, for the then-EPA administrator—an increase of over 110 percent compared to the prior period’s costs of \$1.6 million for the previous administrator—without documented justification. We also found that agents worked overtime without proper justification, resulting in improper payments.

We recommended that the EPA implement new policies, procedures, and guidance for Protective Service Detail operations and agents; regularly complete a threat analysis to identify the proper protection required for the administrator; and identify and report any improper payments to the Office of the Chief Financial Officer. Of the seven recommendations issued to the Office of Enforcement and Compliance Assurance, one remains unresolved.

Resolution Status: The Agency provided responses on August 29, 2019; October 4, 2019; and March 31, 2020. We informed the Agency on May 29, 2020, that its overtime analysis was incorrect. The Office of Enforcement and Compliance Assurance agreed to make the corrections, but hard copy records needed to make the corrections are in the office. Access to the office is limited due to the coronavirus pandemic. The recommendation remains unresolved.

Office of Land and Emergency Management

Report No. 20-P-0066, EPA Can Improve Incident Readiness with Better Management of Homeland Security and Emergency Response Equipment, issued January 3, 2020

Summary: The EPA needs to improve its management of Homeland Security and Emergency Response equipment. Specifically, we found that the EPA did not:

- Identify the Homeland Security and Emergency Response equipment needed to respond to a nationally significant incident.
- Fully use its agencywide equipment system to track the availability of EPA-owned Homeland Security and Emergency Response equipment.
- Address the status of Homeland Security and Emergency Response equipment that is unused or broken.

While the EPA has successfully responded to past incidents, there is a risk that—until it identifies a list of Homeland Security and Emergency Response equipment it needs to meet its responsibilities during an incident—the Agency may not have the correct equipment to respond to future incidents. Also, while the EPA spends \$554,310 annually on the Agency Asset Management System, which has the ability to manage and track the EPA's equipment, the Agency is not using this functionality. Instead, the EPA spent an additional \$2,365,938 to track the equipment outside of its Agency Asset Management System, making it difficult for the EPA to have an accurate inventory of Homeland Security and Emergency Response equipment. Compounding this problem is the mismanagement of unused or broken equipment.

We recommended that the Agency create and maintain an official agencywide list of the equipment needed for incidents, maintain one official agencywide management and tracking system for Homeland Security and Emergency Response equipment, update the Agency Asset Management System to include missing equipment, implement controls to verify and record the status of unused or broken equipment, and verify the implementation of internal controls to justify the Agency keeping unused or broken equipment. The EPA agreed with two recommendations but did not provide corrective actions, and it disagreed with the remaining three recommendations.

Resolution Status: The Agency provided a response to the final report on March 2, 2020, which proposed a corrective action plan for the five recommendations. We accepted the Agency's planned corrective actions for four recommendations, which met the intent of our recommendations. We did not consider the planned corrective action acceptable for Recommendation 2. This recommendation—which is to maintain one official agencywide management and tracking system that provides the status, availability, and acquisition costs for homeland security and emergency response equipment—remains unresolved. In a memorandum dated August 17, 2020, we requested a revised corrective action plan for Recommendation 2. On September 22, 2020, the Agency provided revised corrective actions for Recommendation 2, which are currently under review by the OIG.

Office of Land and Emergency Management; Region 6 Regional Administrator

Report No. 20-P-0062, EPA Needs to Improve Its Emergency Planning to Better Address Air Quality Concerns During Future Disasters, issued December 16, 2019

Summary: Most air toxic emission incidents during Hurricane Harvey occurred within a five-day period of the storm's landfall. The majority of these emissions were due to industrial facilities shutting down and restarting operations in response to the storm and storage tank failures. However, state, local, and EPA mobile air monitoring activities were not initiated in time to assess the impact of these emissions. The air monitoring data collected did not indicate that the levels of individual air toxics after Hurricane Harvey exceeded the health-based thresholds established by the State of Texas and the EPA. These thresholds, however, do not consider the cumulative impact of exposure to multiple air pollutants at one time. Consequently, the thresholds may not be sufficiently protective of residents in communities that neighbor industrial facilities and experience repeated or ongoing exposures to air toxics. In addition, although we

did not identify instances of inaccurate communication from the EPA to the public regarding air quality after Hurricane Harvey, public communication of air monitoring results was limited.

We recommended that the assistant administrator for Land and Emergency Management develop guidance for emergency air monitoring in heavily industrialized areas, develop a plan to provide public access to air monitoring data, and assess the availability and use of remote and portable monitoring methods. We also recommended that the Region 6 regional administrator develop a plan to inform communities near industrial areas of adverse health risks and to limit exposure to air toxics in these communities, as well as conduct environmental justice training. In addition, we recommended that the associate administrator for Public Affairs establish a process to communicate the resolution of public concerns. Four recommendations, which we revised after we issued our draft report, remain unresolved:

- Three recommendations issued to the Office of Land and Emergency Management remain unresolved.

Resolution Status: The EPA provided a formal response on February 28, 2020. The response is currently under review by the OIG. Resolution efforts are underway.

- The one recommendation issued to the Region 6 Administrator remains unresolved.

Resolution Status: The EPA provided a formal response on February 28, 2020. The response is currently under review by the OIG. Resolution efforts are underway.

Office of Mission Support

Report No. [20-P-0065](#), *EPA Needs to Improve Management and Monitoring of Time-Off Awards*, issued December 30, 2019

Summary: The EPA successfully implemented interim policies and procedures for reviewing and approving monetary awards that total more than \$5,000 in a fiscal year for any one employee. However, the Agency does not follow U.S. Office of Personnel Management guidance for valuing time-off awards. Specifically, the EPA does not assess a value for time-off awards as part of its awards program. The Agency, therefore, cannot determine whether its time-off awards are consistently assessed, approved at the appropriate level when combined with monetary awards, and commensurate with employee achievements. We also found that the Agency does not monitor time-off awards as a resource. From calendar years 2015 through 2017, the Agency awarded 355,511 hours—a total of over 170 full-time positions—in time-off awards. However, these awards are not managed or monitored in regard to Agency productivity or workload management. A large number of time-off hours awarded results in lost productivity, which can adversely impact the Agency's mission.

We recommended that the assistant administrator for Mission Support (1) revise EPA Manual 3130 A2, *Recognition Policy and Procedures Manual*, to establish a methodology to determine the equivalent value of time-off awards; (2) update its 2016 interim policy to include the combined value of all awards—both monetary and time-off—when determining the appropriate level of review and approval, and incorporate this update into EPA Manual 3130 A2; and (3) establish internal control procedures to monitor time-off awards as part of EPA resource management. At the time of report issuance, all three recommendations were unresolved.

Resolution Status: The Agency provided a memorandum on August 7, 2020, which outlined the EPA's planned corrective actions and estimated milestone dates for the three recommendations. The OIG reviewed the Agency's response and concluded that the planned actions did not meet the intent of the recommendations. The OIG issued a memorandum on August 27, 2020, that explained why the planned actions did not meet the intent of the recommendations. The recommendations remain unresolved.

Office of the Chief Financial Officer

Report No. [20-P-0063](#), *Outdated EPA Leave Manual and Control Weaknesses Caused Irregularities in the Office of Air and Radiation's Timekeeping Practices*, issued December 19, 2019

Summary: Entitlements under the Family and Medical Leave Act of 1993 are not formalized in the EPA's *Leave Manual*. Without a policy that is updated to reflect current law, staff and supervisors may not be aware of or fully understand leave entitlements under the Act, which may result in decisions about leave that are contrary to public law. Furthermore, our analysis of time-and-attendance records identified untimely prior-pay-period adjustments, which resulted in salary overpayments. We also identified the improper approval of Travel Compensatory Time Off, which is time off earned for time spent in a travel status away from the employee's official duty station that is not

otherwise compensable. Without additional internal controls, employees can make after-the-fact timekeeping adjustments to create salary overpayments or improperly restore leave balances. Employees may also receive Travel Compensatory Time Off that is not in compliance with the EPA's *Pay Administration Manual*.

We made various recommendations to the Agency to improve its timekeeping practices, including updating the leave policy to reflect current law and regulations pertaining to the Family and Medical Leave Act of 1993, establishing time frames and controls for prior pay period adjustments, and enforcing compliance with the required time frames for the submittal and approval of Travel Compensatory Time Off. We also recommended that the EPA determine whether employees should forfeit improperly credited Travel Compensatory Time Off hours, as required by the EPA's *Pay Administration Manual*, and whether the Agency should recover the value of awarded and used time off as needed. The report included five recommendations: three to the Office of Mission Support, one to the Office of Air and Radiation, and one to the Office of the Chief Financial Officer. Of the report's five recommendations, the one recommendation issued to the Office of the Chief Financial Officer—to implement a policy that defines time frames for time and attendance adjustments and implement controls in PeoplePlus to prevent adjustments, without prior approval, after the established time frames—is unresolved.

Resolution Status: The Office of the Chief Financial Officer provided a response on September 24, 2020, which included a corrective action for the unresolved recommendation. The Agency's response is currently under review by the OIG.

Office of the Chief Financial Officer; Office of Chief of Staff

Report No. [19-P-0155](#), *Actions Needed to Strengthen Controls over the EPA Administrator's and Associated Staff's Travel*, issued May 16, 2019

Summary: The OIG identified 40 trips and \$985,037 in costs associated with the former administrator's travel for the ten-month period from March 1 to December 31, 2017. This covered 34 completed and six canceled trips and included costs incurred not only by the then-administrator but also by Protective Service Detail and other staff. We estimated excessive costs of \$123,942 regarding use of first- and business-class travel by the then-administrator and accompanying Protective Service Detail agents. The exception that allowed for the travel accommodation was granted without sufficient justification and, initially, without appropriate approval authority. Although the EPA's travel policy is sufficiently designed to prevent fraud, waste, and abuse and is consistent with the Federal Travel Regulation, we found that the policy did not initially outline who had the authority to approve the administrator's travel authorizations and vouchers. This report made recommendations that remain unresolved to two offices:

- Of the ten recommendations issued to the Office of Chief Financial Officer, eight were unresolved when we issued our final report, and four remain unresolved.

Resolution Status: The Office of the Chief Financial Officer provided a response to our final report on March 31, 2020. The OIG reviewed the Agency's proposed corrections and concluded that corrective actions for four of the unresolved recommendations met the intent of the recommendations. Those four recommendations are resolved. On June 29, 2020, the OIG issued a memorandum to the Agency advising it that the planned corrective actions provided for the other four recommendations did not meet the intent of those recommendations, which remain unresolved. The OIG met with the Office of the Chief Financial Officer on July 29, 2020, and September 16, 2020, to discuss the unresolved recommendations. Resolution efforts are ongoing.

- The two recommendations issued to the Office of Chief of Staff remain unresolved.

Resolution Status: The OIG's meeting with the Office of the Chief Financial Officer on June 29, 2020, included staff from the Office of the Administrator and a discussion of the unresolved recommendations. Resolution efforts are ongoing.

Office of Water

Report No. [19-P-0318](#), *EPA Must Improve Oversight of Notice to the Public on Drinking Water Risks to Better Protect Human Health*, issued September 25, 2019

Summary: Primacy agencies have the responsibility to oversee whether public water systems meet federal requirements, including notifying consumers of certain situations regarding their drinking water. We found that some primacy agencies do not consistently fulfill their responsibility to enforce drinking water public notice requirements. Specifically, some primacy agencies do not consistently record violations, nor do they track the need for and issuance

of public notices. In addition, the EPA's protocol for assessing primacy Agency oversight does not fully cover all public notice requirements. As a result, not all primacy agencies know whether public water systems under their supervision appropriately notify consumers about drinking water problems, and the EPA and primacy agencies do not hold all public water systems to the same compliance standards. Of the nine recommendations issued, three are unresolved.

Resolution Status: On May 19, 2020, the associate deputy administrator informed the OIG that he agreed with the recommendations and delegated implementation of the corrective actions to the assistant administrator for Water. The OIG has not yet received proposed corrective actions for the unresolved recommendations from the Office of Water.

Total reports issued before reporting period for which no management decision had been made as of September 30, 2020 = 8

Reports for Which No Response Was Received Within 60 Days

Office of Mission Support

Report No. [20-P-0200](#), *EPA Needs to Address Internal Control Deficiencies in the Agencywide Quality System*, issued June 22, 2020

Summary: The Office of Mission Support has not fully implemented internal controls for the mandatory agencywide Quality System. We found that the Office of Mission Support has not:

- Reviewed policies, procedures, and guidance within required time frames. For example, reviews of two quality policies were 15 years overdue.
- Conducted required annual reviews for five years or conducted regular assessments of program and regional quality systems. More than half of the systems had not had a review in the past six years.
- Assessed staff and resource needs since 2008 or performed a programmatic risk assessment.
- Developed a strategic plan for the agencywide Quality System.
- Implemented a tracking system.
- Provided training for the agencywide Quality System.

We made 15 recommendations to the assistant administrator for Mission Support to improve internal controls for the agencywide Quality System. The OMS agreed with 13 recommendations, which are either completed or resolved with corrective actions pending. Two recommendations remain unresolved.

Status: While the Agency did not provide a formal written response within 60 days of the final report, it engaged our office in resolution discussions and emailed proposed corrective actions to address the two unresolved recommendations on August 20, 2020. The Agency provided a formal written response on September 22, 2020, which is currently under review by the OIG.

Total reports issued during the reporting period for which the Agency did not provide a written response within 60 days, as of September 30, 2020 = 1

Appendix 3—Reports with Corrective Action Not Completed

In compliance with reporting requirements of Sections 5(a)(3) and 5(a)(10)(C) of the Inspector General Act of 1978, as amended, we are to identify each significant recommendation described in previous semiannual reports on which corrective action has not been completed, as well as a summary of each audit, inspection, and evaluation report for which there are any outstanding unimplemented recommendations. We are also to identify the aggregate potential monetary benefits of the unimplemented recommendations.

This appendix contains separate tables of unimplemented recommendations described in previous semiannual reports for the EPA and the CSB from 2008 to September 30, 2020, which were issued in 51 OIG audit reports.

There is a total of 112 current and unimplemented recommendations for the EPA with total potential monetary benefits of approximately \$74 million, \$37 million of which was sustained and redeemed by the Agency. Sustained cost is the dollar value of questioned costs or monetary benefits identified by the OIG during an audit or evaluation and agreed to in whole or in part by the Agency. There are three CSB recommendations with \$0.349 million of sustained monetary benefits.

Below is a list of the responsible EPA offices and regions responsible for the recommendations in the following tables. While a recommendation may be listed as unimplemented, the Agency may be on track to complete agreed-upon corrective actions by the planned due date.

Responsible EPA Offices:

AA	Associate Administrator
ADA	Associate Deputy Administrator (within the Office of the Administrator)
DA	Deputy Administrator (within the Office of the Administrator)
OAR	Office of Air and Radiation
OCFO	Office of the Chief Financial Officer
OCSP	Office of Chemical Safety and Pollution Prevention
OECA	Office of Enforcement and Compliance Assurance
OGC	Office of General Counsel
OITA	Office of International and Tribal Affairs
OLEM	Office of Land and Emergency Management
OMS ¹	Office of Mission Support
ORD	Office of Research and Development
OW	Office of Water
Region 2	
Region 5	
Region 6	
Region 8	
Region 9	
Region 10	

¹ Effective November 26, 2018, the former Office of Environmental Information and Office of Administration and Resources Management were merged into the new Office of Mission Support. In this appendix, any recommendations originally issued to the former offices will be listed as under the purview of the new office.

EPA Reports with Unimplemented Recommendations

Report title, number, and date	Office	Unimplemented recommendation	Planned completion date *	Revised completion date	Potential monetary benefits (in \$000s)
Category 1—Management and Operations					
EPA Did Not Accurately Report Under the Grants Oversight and New Efficiency Act and Needs to Improve Timeliness of Expired Grant Closeouts 20-P-0126 , March 31, 2020	OMS	1. Correct and resubmit the 2017 and 2018 Grants Oversight and New Efficiency Act reporting to the Office of Management and Budget.	12/31/20		
		2. Establish internal controls to verify that accurate information on grant awards is submitted in future Annual Financial Reporting.	12/31/20		
		3. Implement controls as required by EPA Order 5700.6 A2 CHG 2, <i>Policy on Compliance, Review and Monitoring</i> , to obtain closeout strategies when Grants Management Offices are not meeting the closeout metrics for grant awards.	U	6/15/20	
		4. Develop and implement Office of Grants and Debarment policy specific to grant closeouts that have been delayed one year or longer to escalate such instances to the Office of Grants and Debarment for action in support of closeout efforts (regardless of future collection of funds, audits, or reviews, as well as of property management and disposition processes).	U	6/30/20	\$8,282
EPA Needs to Improve Its Risk Management and Incident Response Information Security Functions 20-P-0120 , March 24, 2020	OMS	1. Develop and maintain an up-to-date inventory of the software and associated licenses used within the Agency.	2/5/20		
		2. Establish a control to validate that Agency personnel are creating the required plans of action and milestones for weaknesses that are identified from vulnerability testing but not remediated within the Agency's established time frames per the EPA's information security procedures.	12/31/21		
EPA Can Improve Incident Readiness with Better Management of Homeland Security and Emergency Response Equipment 20-P-0066 , January 3, 2020	ADA and OLEM	5. Require special team to verify implementation of internal controls for their teams that justify maintaining unused or broken equipment in accordance with requirements in the EPA Personal Property Manual.	1/31/21		835
Outdated EPA Leave Manual and Control Weaknesses Caused Irregularities in the Office of Air and Radiation's Timekeeping Practices 20-P-0063 , December 19, 2020	OMS	5. Evaluate and determine whether the improperly credited Travel Compensatory Time Off should have been forfeited as required by the EPA's Pay Administration Manual and, if so, whether the time off or value of any time off used should be recovered.	1/31/21		
EPA's Fiscal Years 2019 and 2018 (Restated) Consolidated Financial Statements 20-F-0033 , November 19, 2019	OCFO	1. Evaluate and improve the EPA's process for preparing financial statements.	7/31/20	12/31/20	
		3. Update the accounting models to properly record collections and not reduce an account receivable account.	9/30/21		
		4. Establish accounting models to properly record e-Manifest account receivables and recognize earned revenue at the transaction level.	9/30/21		
		5. Establish accounting models to properly classify and record interest, fines, penalties and fees.	9/30/21		
		6. Establish accounting models to properly record receivables, collections and earned revenue from federal versus nonfederal vendors.	9/30/21		
Management Alert: EPA Still Unable to Validate that Contractors Received Role-Based Training for Information Security Protection 20-P-0007 , October 21, 2019	OMS	3. Implement a plan to analyze the EPA's information technology services contractual agreements initiated prior to EPA Acquisition Guide 39.1.2 to (a) determine how many of these agreements require modification to include role-based training requirements and (b) include the training requirements in the respective agreements.	4/10/20	2/28/20	

Report title, number, and date	Office	Unimplemented recommendation	Planned completion date *	Revised completion date	Potential monetary benefits (in \$000s)
Follow-Up Audit: EPA Took Steps to Improve Records Management. 19-P-0283 , August 27, 2019	OGC	1. Issue an updated agency Freedom of Information Act policy and procedure.	12/5/19	3/31/20	
EPA Needs to Improve Oversight of the Senior Environmental Employment Program 19-P-0198 , June 24, 2019	OMS	5. Revise the <i>SEE Guidance and Procedures Manual</i> to include internal controls related to reviewing and setting wage rates, the timing for pay scale reviews, and responsibilities.	4/30/20	8/30/20	
EPA Overpaid Invoices Due to Insufficient Contract Management Controls 19-P-0157 , May 20, 2019	OMS	2. Establish internal controls to verify that all required Contractor Performance Assessment Reporting System reports are finalized. Complete fiscal years 2016 and 2017 reports for the contract audited.	6/28/19	1/1/20	
		6. Revoke the certification of the contract-level Contracting Officer's Representative responsible for paying invoices without adequate review.	6/28/19		5
		7. Investigate the circumstances surrounding the then-Office of Environmental Information manager involved with these contract transactions and determine whether the manager's actions were appropriate. If not, implement appropriate actions.	6/28/19		
Self-Insurance for Companies with Multiple Cleanup Liabilities Presents Financial and Environmental Risks for EPA and the Public 18-P-0059 , December 22, 2017	OLEM	3. Update standard operating procedures and data systems to accommodate the changes implemented for risk management actions.	9/30/21		
	OLEM	4. Train staff on the implemented risk management actions.	12/31/21		
	OECA	5. Develop or update existing standard operating procedures to outline the Office of Land and Emergency Management and Office of Enforcement and Compliance Assurance roles and responsibilities for overseeing the validity of Resource Conservation and Recovery Act and Superfund financial assurance instruments, where needed.	6/30/20	9/30/21	
		6. Develop and include procedures for checking with other regions for facilities/sites with multiple self-insured liabilities in the standard operating procedures created for Recommendation 5.	6/30/20	9/30/21	
		7. Develop and include instructions on the steps to take when an invalid financial assurance instrument (expired, insufficient in dollar amount, or not provided) is identified in the standard operating procedures created for Recommendation 5 and collect information on the causes of invalid financial assurance.	6/30/20	9/30/21	
8. Train staff on the procedures and instructions developed for Recommendations 5 through 7.	9/30/20				
Conditions in the U.S. Virgin Islands Warrant EPA Withdrawing Approval and Taking Over Management of Some Environmental Programs and Improving Oversight of Others 15-P-0137 , April 17, 2015	Region 2	18. Develop a plan to address currently uncompleted tasks and activities, and develop a schedule for reprogramming grant funds to accomplish these tasks if the U.S. Virgin Islands does not or cannot complete them. Upon completion of the financial management corrective actions, follow the Office of the Chief Financial Officer's Resource Management Directive System 2520-03 to determine whether any of the current unspent funds of approximately \$37 million under the U.S. Virgin Islands' assistance agreements could be put to better use.	9/30/18	9/30/19 3/31/20 3/31/21	37,000
Internal Controls Needed to Control Costs of Emergency and Rapid Response Services Contracts, as Exemplified in Region 6 14-P-0109 , February 4, 2014	Region 6	3. Direct contracting officers to require that the contractor adjust all its billings to reflect the application of the correct rate to team subcontract other direct costs.	9/30/24		

Report title, number, and date	Office	Unimplemented recommendation	Planned completion date *	Revised completion date	Potential monetary benefits (in \$000s)
EPA Oversight over Enterprise Customer Service Solution Needs Improvement 19-P-0278 , August 19, 2019	OMS	6. Update the Capital Planning and Investment Control policy and procedure to incorporate the existing requirement for the Agency to document its formal evaluations of Capital Planning and Investment Control "medium" and "lite" investments.	U	9/30/20	
Pesticide Registration Fee, Vulnerability Mitigation and Database Security Controls for EPA's FIFRA and PRIA Systems Need Improvement 19-P-0195 , June 21, 2019	OCSP	2. Complete the actions and milestones identified in the Office of Pesticide Programs' PRIA Maintenance Fee Risk Assessment document and associated plan regarding the fee payment and refund posting processes.	12/31/20		
Insufficient Practices for Managing Known Security Weaknesses and System Settings Weaken EPA's Ability to Combat Cyber Threats 19-P-0158 , May 21, 2019	OMS	1. Establish a control to validate that agency personnel are creating the required plans of action and milestones for those weaknesses identified from the vulnerability testing but not remediated within the agency's established timeframes per the EPA's information security procedures.	12/31/21		
		2. Establish a process to periodically review the agency's information security weakness tracking system's settings to validate that each setting is appropriately implemented and compliant with the agency's standards.	10/31/19		
EPA's Fiscal Years 2018 and 2017 Consolidated Financial Statements 19-F-0003 , November 14, 2018	OMS	15. Perform a review of system requirements and evaluate the suitability of existing technology to replace or implement updates to the computer room's surveillance system and generators. Update or replace, if warranted, the equipment based on the results of the evaluation. (OARM)	1/15/22		
Category 2—Water Quality					
EPA Must Improve Oversight of Notice to the Public on Drinking Water Risks to Better Protect Human Health 19-P-0318 , September 25, 2019	OW	3. Define for primacy agencies and public water systems acceptable methods and conditions under which the electronic delivery of Tiers 2 and 3 notices meet the Safe Drinking Water Act's direct delivery requirement.	9/30/20		
		4. Update the EPA's drinking water program review protocols to include steps for reviewing Tier 3 notices and for citing primacy agencies that do not retain complete public notice documentation.	12/31/20		
		5. Update and revise the 2010 <i>Revised State Implementation Guidance for the Public Notification Rule</i> to include: a. Public notice delivery methods that are consistent with regulations. b. Information on modern methods for delivery of public notice.	9/30/20		
		6. Update and revise the 2010 <i>Public Notification Handbooks</i> to include: a. Public notice delivery methods that are consistent with regulations. b. Information on modern methods for delivery of public notice. c. Public notice requirements for the latest drinking water regulations. d. Procedures for public water systems to achieve compliance after violating a public notice regulation. e. Up-to-date references to compliance assistance tools. f. Additional resources for providing public notice in languages other than English.	9/30/20		
	OW and OECA	7. Conduct a national review of the adequacy of primacy agency implementation, compliance monitoring, reporting and enforcement of the Safe Drinking Water Act's public notice requirements.	12/31/20		

Report title, number, and date	Office	Unimplemented recommendation	Planned completion date *	Revised completion date	Potential monetary benefits (in \$000s)
	OW and OECA	9. Implement a strategy and internal controls to improve the consistency of public notice violation data available in the EPA's new national drinking water database, including the review and update of open public notice violations prior to migrating the data to the new database.	9/30/20		
EPA Region 6 Quickly Assessed Water Infrastructure after Hurricane Harvey but Can Improve Emergency Outreach to Disadvantaged Communities 19-P-0236 , July 16, 2019	Region 6	2. Revise the Region 6 pre-landfall hurricane plan to incorporate steps based on the results of outreach conducted during the planning and pre-landfall preparation exercises.	3/31/21		
EPA Region 5 Needs to Act on Transfer Request and Petition Regarding Ohio's Concentrated Animal Feeding Operation Permit Program 19-N-0154 , May 15, 2019	Region 5	2. Issue a decision regarding the citizen petition to withdraw Ohio's National Pollutant Discharge Elimination System program with respect to Concentrated Animal Feeding Operations and related permitting authority.	3/31/20	12/31/20	
Management Weaknesses Delayed Response to Flint Water Crisis 18-P-0221 , July 19, 2018	OW	1. Establish controls to annually verify that states are monitoring compliance with all Lead and Copper Rule requirements, including accurately identifying tier 1 sampling sites and maintaining continuous corrosion control treatment.	U	9/20/19 3/31/20	
		2. Include in the revised Lead and Copper Rule the most protective protocols for monitoring and corrosion control.	2/28/19	3/31/20	
EPA Needs to Provide Leadership and Better Guidance to Improve Fish Advisory Risk Communications 17-P-0174 , April 12, 2017	OW	1. Provide updated guidance to states and tribes on clear and effective risk communication methods for fish advisories, especially for high-risk groups. This guidance could recommend posting fish advisory information at locations where fish are caught and using up-to-date communication methods that include social media, webinars, emails, newsletters, etc.	3/31/20	12/16/20	
		2. Working with states and tribes, develop and disseminate best practices they can use to evaluate the effectiveness of fish advisories in providing risk information to subpopulations, such as subsistence fishers, tribes and other high fish-consuming groups.	3/30/20	12/16/20	
EPA Needs to Further Improve How It Manages Its Oil Pollution Prevention Program 12-P-0253 , February 6, 2012	OLEM	1. Improve oversight of facilities regulated by the EPA's oil pollution prevention program by: d. Producing a biennial public assessment of the quality and consistency of Spill Prevention, Control, Countermeasure Plans and Facility Response Plans based on inspected facilities.	U	6/30/20 10/2/20	
EPA Should Revise Outdated or Inconsistent EPA-State Clean Water Memoranda of Agreement 10-P-0224 , September 14, 2010	OW	2-2. Develop a systematic approach to identify which states have outdated or inconsistent memorandums of agreements; renegotiate and update those Memorandums of Agreements using the Memorandum of Agreements template; and secure the active involvement and final, documented concurrence of headquarters to ensure national consistency.	9/28/18	9/30/20	

Report title, number, and date	Office	Unimplemented recommendation	Planned completion date *	Revised completion date	Potential monetary benefits (in \$000s)
Category 3—Environmental Contamination and Cleanup					
Management Alert: Unapproved Use of Slag at Anaconda Co. Smelter Superfund Site 20-N-0030 , November 18, 2019	Region 8	1. Notify any individuals or businesses known to be involved in the collection or sale of the slag that those are not approved uses of slag. The OIG recommends that Region 8 identify any other federal, state or local agencies with oversight on this matter and notify those entities accordingly.	3/31/20		
		2. Determine how long and approximately how many souvenirs bags of slag have been sold and determine what should be done to inform purchasers of the health risks that the slag souvenirs may pose to them.	3/31/20		
		3. Create and distribute, both in hard copy and via the EPA 's website, a fact sheet for the public that describes the potential hazards associated with souvenir bags of slag, noting any precautions that are needed, especially for children; how to properly dispose of the bags, and any use, handling or storage of the bags of slag.	3/31/20		
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 20-P-0011 , October 24, 2019	OECA	1. Revise the August 2009 Guidance on Determining and Tracking Substantial Noncompliance with CERCLA Enforcement Instruments in CERCLIS to (a) better define "In Substantial Noncompliance" and "Not in Substantial Noncompliance" and (b) require correction of the Substantial Noncompliance status when headquarters is consulted by the regions for an issue that meets the Substantial Noncompliance definition.	6/30/20		
		2. Communicate to EPA regions clarified guidance on proper designations of Substantial Noncompliance and how to report them in the Superfund Enterprise Management System so that all regions consistently identify instances of Substantial Noncompliance.	8/31/20		
		3. Remind regions to correct and update the Superfund Enterprise Management System compliance data as appropriate for all active enforcement instruments.	8/31/20		
		4. Develop, document, and assign the roles and responsibilities of headquarters staff for oversight of monitoring noncompliance with Superfund enforcement instruments.	11/30/20		
EPA Unable to Assess the Impact of Hundreds of Unregulated Pollutants in Land-Applied Biosolids on Human Health and the Environment 19-P-0002 , November 15, 2018	OW	3. Complete development of the probabilistic risk assessment tool and screening tool for biosolids land application scenarios.	12/31/21		
		4. Develop and implement a plan to obtain the additional data needed to complete risk assessments and finalize safety determinations on the 352 identified pollutants in biosolids and promulgate regulations as needed.	12/31/22		
		6. Publish guidance on the methods for the biosolids pathogen alternatives 3 and 4.	12/31/20		
		8. Issue updated and consistent guidance on biosolids fecal coliform sampling practices.	12/31/20		
EPA Needs to Finish Prioritization and Resource Allocation Methodologies for Abandoned Uranium Mine Sites on or Near Navajo Lands 18-P-0233 , August 22, 2018	Regions 6 and 9	1. Complete the necessary removal site evaluations and engineering evaluations/cost analyses.	12/31/20		
		2. Fully develop and implement prioritization and resource allocation methodologies for the Tronox abandoned uranium mine sites on or near Navajo Nation lands.	12/31/21		

Report title, number, and date	Office	Unimplemented recommendation	Planned completion date *	Revised completion date	Potential monetary benefits (in \$000s)
Improvements Needed in EPA Training and Oversight for Risk Management Program Inspections 13-P-0178 , March 21, 2013	OLEM	7. Coordinate with the assistant administrator for Enforcement and Compliance Assurance to revise inspection guidance to recommend minimum inspection scope for the various types of facilities covered under the program and provide detailed examples of minimum reporting.	7/31/14	2/25/19 6/30/22	
		8. Coordinate with the assistant administrator for Enforcement and Compliance Assurance to develop and implement an inspection monitoring and oversight program to better manage and assess the quality of program inspections, reports, supervisory oversight, and compliance with inspection guidance.	9/30/14	2/28/20 6/30/23	
Making Better Use of Stringfellow Superfund Special Accounts 08-P-0196 , July 9, 2008	Region 9	2. Reclassify or transfer to the Trust Fund, as appropriate, \$27.8 million (plus any earned interest less oversight costs) of the Stringfellow special accounts in annual reviews, and at other milestones including the end of Fiscal Year 2010, when the record of decision is signed and the final settlement is achieved.	12/31/12	9/30/23	27,800
Category 4—Toxics, Chemical Safety, and Pesticides					
EPA Toxic Substance Control Act Consent Orders Need Better Coordination 20-E-0177 , May 28, 2020	OCSP	2. Implement a process to provide final Toxic Substances Control Act Section 5(e) Consent Orders to regions with facilities subject to the terms and conditions of the Consent Orders in an appropriate time frame, and verify that EPA regions acknowledge receipt of the final Toxic Substances Control Act Section 5(e) Consent Orders. Corrective Action 2: The Agency has identified a corrective action that will provide a searchable database of TSCA Section 5(e) Consent Orders that will enable regions to focus on compliance monitoring and enforcement activities they should perform per OECA's National Program Guidance for fiscal years 2020–2021. The search tool is expected to be completed by December 31, 2020.	12/31/20		
Management Controls Needed to Verify and Report Border 2020 Program Accomplishments 20-P-0083 , February 18, 2020	OITA	1. Establish and implement management controls to increase reliability of the Border 2020: U.S.-Mexico Environmental Program action plans by standardizing the action plan format to include key data, such as the relevant goal, objective, subobjective, requests for proposal, grant amount, and project status.	12/31/20		
		2. Establish and implement management controls to determine how and when Policy Forums action plans will be developed.	12/31/20		
		3. Develop performance measures to track progress toward Border 2020: U.S.-Mexico Environmental Program goals and objectives.	10/1/20		
		4. Establish and implement management controls to increase transparency of the Border 2020: U.S.-Mexico Environmental Program by sharing the North American Development Bank subgrantee fact sheets on the EPA's Border 2020 Program website.	12/31/20		
		5. Establish and implement management controls to increase transparency of the Border 2020: U.S.-Mexico Environmental Program by providing stakeholder and public access, as appropriate, to the program's funded products such as studies, reports, and videos on the EPA's Border 2020 Program website.	12/31/20		

Report title, number, and date	Office	Unimplemented recommendation	Planned completion date *	Revised completion date	Potential monetary benefits (in \$000s)
Tribal Pesticide Enforcement Comes Close to Achieving EPA Goals, but Circuit Rider Inspector Guidance Needed 20-P-0012 , October 29, 2019	OECA	1. Require circuit riders to include the pesticide needs and risks of each tribe on their circuit in the development of their priority-setting plans, which are a required component of tribal pesticide enforcement cooperative agreements.	12/31/22		
		2. Develop and implement tribal circuit rider guidance for pesticide inspectors that includes expectation-setting and communication with tribes that are being served under a tribal pesticide enforcement cooperative agreement.	12/31/22		
		3. Develop and implement regional processes to receive feedback directly from tribes using pesticide circuit riders.	12/31/22		
EPA Not Effectively Implementing the Lead-Based Paint Renovation, Repair and Painting Rule 19-P-0302 , September 9, 2019	OECA	1. Identify the regulated universe of Lead-Based Paint Renovation, Repair and Painting Rule firms in support of regional targeting strategies, in coordination with the Office of Chemical Safety and Pollution Prevention.	U	12/31/21	
		2. Establish Lead-Based Paint Renovation, Repair and Painting Rule enforcement objectives, goals, and measurable outcomes.	U	7/1/21	
		3. Establish management oversight controls to verify that Lead-Based Paint Renovation, Repair and Painting Rule Program guidance and expectations are being met; this may also involve specific reporting requirements for regions and authorized states and tribes.	U	10/1/20	
		4. Establish or identify an effective forum to document and share best practices and innovations related to the Lead-Based Paint Renovation, Repair and Painting Rule Program.	U	10/1/20	
	OCSP	5. Establish specific guidelines for resources and funding allocated to the Lead-Based Paint Renovation, Repair and Painting Rule Program that will further the goals of the Federal Action Plan to Reduce Childhood Lead Exposures and Associated Health Impacts.	12/31/20		
	6. Establish the Lead-Based Paint Renovation, Repair and Painting Rule Program's objectives, goals and measurable outcomes, such as measures to demonstrate the effectiveness of program contributions toward decreasing elevated blood lead levels.	12/31/20			
EPA Needs to Determine Strategies and Level of Support for Overseeing State Managed Pollinator Protection Plans 19-P-0275 , August 15, 2019	OCSP	5. Determine how the EPA can use the Managed Pollinator Protection Plan survey results to advance its National Program Manager Guidance goals and its regulatory mission.	6/30/21		
Measures and Management Controls Needed to Improve EPA's Pesticide Emergency Exemption Process 18-P-0281 , September 25, 2018	OCSP	5. Develop concise emergency exemption application guidance that specifies the minimum requirements of an application submission and is available on the Office of Pesticide Programs Section 18 website.	9/30/20		
		6. Provide clear guidance to state lead agencies on how and when they can use efficacy data from other state lead agencies to satisfy the emergency exemption application criteria.	9/30/20		
EPA Needs to Evaluate the Impact of the Revised Agricultural Worker Protection Standard on Pesticide Exposure Incidents 18-P-0080 , February 15, 2018	OCSP	1. In coordination with the Office of Enforcement and Compliance Assurance, develop and implement a methodology to evaluate the impact of the revised Agricultural Worker Protection Standard on pesticide exposure incidents among target populations.	U	12/31/22	
EPA Needs to Manage Pesticide Funds More Efficiently 17-P-0395 , September 18, 2017	OCSP	2. Develop and implement a plan to reduce excess Pesticides Reregistration and Expedited Processing Fund and Pesticide Registration Fund balances within the established target range.	12/31/21		

Report title, number, and date	Office	Unimplemented recommendation	Planned completion date *	Revised completion date	Potential monetary benefits (in \$000s)
Additional Measures Can Be Taken to Prevent Deaths and Serious Injuries from Residential Fumigations, 17-P-0053 , December 12, 2016	OCSP	3. Conduct an assessment of clearance devices to validate their effectiveness in detecting required clearance levels, as part of the Office of Pesticide Programs ongoing reevaluation of structural fumigants.	11/30/17	8/31/21	
Category 5—Air Quality					
Management Alert: Prompt Action Needed to Inform Residents Living Near Ethylene Oxide-Emitting Facilities About Health Concerns and Actions to Address Those Concerns 20-N-0128 , March 31, 2020	ADA	1. Improve and continue to implement ongoing risk communication efforts by promptly providing residents in all communities near the 25 ethylene oxide-emitting facilities identified as high-priority by the EPA with a forum for an interactive exchange of information with the EPA or the states regarding health concerns related to exposure to ethylene oxide.	U	9/30/20	
EPA Needs to Improve Its Emergency Planning to Better Address Air Quality Concerns During Future Disasters 20-P-0062 , December 16, 2019	AA of Public Affairs	5. Revise the EPA's <i>Crisis Communication Plan</i> to include a communication process to inform affected communities about the resolution of community concerns raised during an emergency.	12/30/20		
More Effective EPA Oversight Is Needed for Particulate Matter Emissions Compliance Testing 19-P-0251 , July 30, 2019	OECA	1. Develop and implement a plan for improving the consistency of stack test reviews across EPA regions and delegated agencies.	3/31/22		
	OAR	2. Assess the training needs of EPA regions and state, local, and tribal agencies concerning stack test plans and report reviews and EPA test methods and develop and publish a plan to address any training shortfalls.	3/31/22		
		3. Develop stack test report checklists for EPA Method 5 and other frequently used EPA methods to assist state, local, and tribal agencies in their review of stack test plans and reports.	6/30/21		
	Region 10	5. Develop a communication plan to make all state and local agencies within Region 10 aware of EPA requirements and guidance for conducting stack testing oversight.	5/31/22		
		6. Develop and implement controls to assess delegated agencies' stack testing oversight activities.	3/31/22	12/21/22	
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 20-P-0047 , December 5, 2019	OAR	1. In consultation with the Associate Administrator for Policy, for the proposed Glider Repeal Rule, per identify for the public (e.g., via the public substantive change of economic significance submitted to the Office of Information and review and the action subsequently whether that change was made at the recommendation of the Office of Affairs.	12/31/19	3/31/21	
EPA Effectively Screens Air Emissions Data from Continuous Monitoring Systems but Could Enhance Verification of System Performance 19-P-0207 , June 27, 2019	OAR	1. Develop and implement electronic checks in the EPA's Emissions Collection and Monitoring Plan System or through an alternative mechanism to retroactively evaluate emissions and quality assurance data in instances where monitoring plan changes are submitted after the emissions and quality assurance data have already been accepted by the EPA.	3/31/25		

Report title, number, and date	Office	Unimplemented recommendation	Planned completion date *	Revised completion date	Potential monetary benefits (in \$000s)
EPA Demonstrates Effective Controls for Its On-Road Heavy-Duty Vehicle Compliance Program; Further Improvements Could Be Made 19-P-0168 , June 3, 2019	OAR	1. Define performance measures to assess the performance of the EPA's on-road heavy-duty vehicle and engine compliance program.	9/30/22		
		2. Conduct and document a risk assessment for the on-road heavy-duty vehicle and engine compliance program that prioritizes risk and links specific control activities to specific risks. Update the risk assessment on a scheduled and periodic basis.	6/30/21		
		3. Address the following risks as part of the on-road heavy-duty vehicle and engine compliance program risk assessment, in addition to other risks that the EPA identifies: <ul style="list-style-type: none"> a. Non-criteria pollutants not being measured. b. Level of heavy-duty sector testing throughout the compliance life cycle. c. Marketplace ambiguity over regulatory treatment of rebuilt versus remanufactured engines. d. Different compliance challenges for heavy-duty compression-ignition and spark-ignition engines. e. Lack of laboratory test cell and in-house testing capacity for heavy-duty spark-ignition engines. 	9/30/21		
		4. Evaluate the following issues, which may require regulatory or programmatic action, as part of (1) the on-road heavy-duty vehicle and engine emission control program risk assessment and (2) the EPA's annual regulatory agenda development process: <ul style="list-style-type: none"> a. Regulatory definition of on-road heavy-duty engine useful life may not reflect actual useful life. b. Not-to-Exceed standard may not reflect real-world operating conditions, especially for certain applications. c. In-use testing requirements for heavy-duty spark-ignition engines may be needed. d. A particle number standard may more accurately control particulate matter emissions that impact human health. 	9/30/22		
		6. Conduct and document an evaluation of opportunities to reassess the manufacturer in-use testing program, including the use of targeted, nonstandard testing in areas of concern.	9/30/20	3/31/21	
EPA Did Not Identify Volkswagen Emissions Cheating; Enhanced Controls Now Provide Reasonable Assurance of Fraud Detection 18-P-0181 , May 15, 2018	OAR	1. Define performance measures to assess the performance of the EPA's light-duty vehicle compliance program.	3/31/21		

Report title, number, and date	Office	Unimplemented recommendation	Planned completion date *	Revised completion date	Potential monetary benefits (in \$000s)
Improved Data and EPA Oversight Are Needed to Assure Compliance With the Standards for Benzene Content in Gasoline 17-P-0249 , June 8, 2017	OAR	1. Improve controls over the reporting system to assure facility-submitted data are of the quality needed to assess compliance with the regulations. These controls should provide reasonable assurance that the following occurs: a. Volumes and average benzene concentrations in facilities' annual benzene reports match those calculated based on their batch reports. b. Benzene concentrations in facility batch reports and annual benzene reports contain two decimal places. c. Production dates match the compliance year in facility reports. d. Facilities use only valid product codes in their reports. e. Only valid company and facility identification numbers are used. f. Maximum average benzene concentrations for the second compliance period and beyond match the corresponding annual average benzene concentrations. g. Import companies aggregate their facilities and submit just one annual benzene report. h. All required reports are submitted.	U	6/30/20 12/31/20	
		3. Revise the benzene regulations to require that attest engagements verify annual average benzene concentrations and volumes with batch reports, to ensure that credits needed or generated are correct.	U	9/30/20	
		6. Ensure the integrity of benzene credit trading by developing and implementing a process to verify that annual average benzene concentration and total volume values that facilities input into the trading database are supported by batch reports.	6/30/20	12/31/20	
		9. Revise the annual benzene report so that facilities must report the number of benzene deficits or credits at the end of the current reporting year.	9/30/20		
EPA Has Not Met Certain Statutory Requirements to Identify Environmental Impacts of Renewable Fuel Standard 16-P-0275 , August 18, 2016	OAR	2. Complete the anti-backsliding study on the air quality impacts of the Renewable Fuel Standard as required by the Energy Independence and Security Act.	9/30/24		
		3. Determine whether additional action is needed to mitigate any adverse air quality impacts of the Renewable Fuel Standard as required by the Energy Independence and Security Act.	9/30/24		
Category 6—Research and Laboratories					
Regional Research Programs Address Agency Needs but Could Benefit from Enhanced Project Tracking 19-P-0123 , April 18, 2019	ORD	1. Complete data entry of all Regional Sustainability and Environmental Sciences projects into the Regional Science Program Tracker.	10/1/20		
		2. Verify and update information for Regional Applied Research Effort projects in the Regional Science Program Tracker.	10/1/20		
		3. Update the Regional Science Program Tracker to improve Regional Applied Research Effort/Regional Sustainability and Environmental Sciences project tracking by including: a. A timeline with significant dates/milestones and events. b. Significant products/outputs that stem from a project, including interim products/outputs to show project progress prior to completion/final report. c. A feature to prompt staff to add impacts and/or evidence of use of project results in decision-making.	10/1/20		

Report title, number, and date	Office	Unimplemented recommendation	Planned completion date *	Revised completion date	Potential monetary benefits (in \$000s)
		4. Update the Regional Applied Research Effort Program Annual Process Guidelines to require that Regional Science Liaisons use the Regional Science Program Tracker and increase awareness of the system among regional staff as a one-stop source of information on regional research projects.	10/1/20		
EPA Needs a Comprehensive Vision and Strategy for Citizen Science that Aligns with Its Strategic Objectives on Public Participation 18-P-0240 , September 5, 2018	DA	1. Establish a strategic vision and objectives for managing the use of citizen science that identifies: <ul style="list-style-type: none"> a. Linkage to the agency's strategic goals, b. Roles and responsibilities for implementation, and c. Resources to maintain and build upon existing agency expertise. 	12/31/20		
		2. Through appropriate EPA offices, direct completion of an assessment to identify the data management requirements for using citizen science data and an action plan for addressing those requirements, including those on sharing and using data, data format/standards, and data testing/validation.	12/31/20		
	ORD	3. Finalize, in coordination with the Office of Environmental Information and Region 1, the <i>Draft Quality Assurance Handbook for Citizen Science</i> , and communicate to Agency staff and citizen science groups the availability and content of this handbook.	12/31/20		
		4. Build capacity for managing the use of citizen science, and expand awareness of citizen science resources, by: <ul style="list-style-type: none"> a. Finalizing the checklist on administrative and legal factors for Agency staff to consider when developing citizen science projects, as well as identifying and developing any procedures needed to ensure compliance with steps in the checklist. b. Conducting training and/or marketing on the EPA's citizen science intranet site for program and regional staff in developing projects. c. Finalizing and distributing materials highlighting project successes and how the EPA has used results of its investment in citizen science. 	12/31/20		
Total					\$73,922

U—Unresolved when the report was issued and resolved at a later date.

CSB Reports with Unimplemented Recommendations

Report title, number, and date	Office	Unimplemented recommendation	Planned completion date	Revised completion date	Potential monetary benefits (in \$000s)
Category 1—Management and Operations					
CSB Needs to Continue to Improve Agency Governance and Operations 16-P-0179 , May 23, 2016	CSB	6. Include the General Services Administration in any future office leasing plans and revisit office needs for a potential adjustment or supplement to the Washington, D.C., and Denver office leases to reduce space within the General Services Administration benchmarks.	10/20/22		\$349
CSB Still Needs to Improve Its 'Incident Response' and 'Identity and Access Management' Information Security Functions 19-P-0147 , May 9, 2019	CSB	1. Implement use of Homeland Security Presidential Directive-12, regarding Personal Identity Verification card technology for physical and logical access, as required. If unable to implement this card technology, obtain a waiver from the Office of Management and Budget not to operate as required by the National Institute of Standards and Technology.	10/28/19	3/31/20 12/30/20	
CSB's Information Security Program Is Defined, but Improvements Needed in Risk Management, Identity and Access Management, and Incident Response 20-P-0077 , February 12, 2020	CSB	1. Define and document risk management procedures for identifying, assessing and managing information technology supply chain risk.	4/30/20	6/30/21	
Total					\$349

Appendix 4—Closed Investigations Involving Senior Employees

For Reporting Period Ending September 30, 2020

Section 5(a)(19) of the Inspector General Act of 1978, as amended, requires a report on each investigation involving a senior government employee where allegations of misconduct were substantiated. Section 5(a)(22) of the Inspector General Act requires a detailed description of the particular circumstances of any investigation conducted by the OIG involving a senior government employee that is closed and was not disclosed to the public. Details on each investigation conducted by the OIG involving senior employees closed during the semiannual reporting period ending September 30, 2020, are provided below.

CASE NUMBER: OI-HQ-2020-ADM-0017

An EPA GS-15 employee allegedly violated ethics requirements by working as a real estate agent during nonworking hours. The investigation determined that the employee obtained an off-duty employment authorization to work as a realtor from the employee's designated ethics official. The allegation was not supported.

CASE NUMBER: OI-AT-2020-ADM-0018

An EPA SES employee allegedly had, or gave the appearance of having, an inappropriate relationship with an EPA Region 4 contractor. The employee also allegedly directed EPA contracts to this contractor because of their relationship. The investigation found that the employee's actions led to an appearance of bias toward the EPA contractor and an appearance that the employee caused contract awards to be directed to the contractor. The investigation also determined that the employee's actions were within the employee's authority and established contracting procedures. The investigation identified no evidence of criminal wrongdoing by the employee, who retired from federal service before the investigation was completed.

CASE NUMBER: OI-CH-2019-ADM-0026

An EPA GS-15 employee allegedly directed employees to expedite the installation of an electric vehicle charging station, which resulted in the misuse of a government purchase card. The investigation determined that the GS-15 employee did not want to solicit bids from contractors to install an electric vehicle charging station and instead opted to use a government purchase card to pay for the installation to expedite the process. The purchase violated the card's authorizations. The allegation was supported. EPA management took corrective action. The employees directed by the GS-15 each received a two-day suspension and a written warning.

CASE NUMBER: OI-AT-2020-ADM-0045

An EPA GS-15 employee allegedly instructed managers to falsify an EPA GS-13 employee's timesheet while the employee was incarcerated. The GS-13 employee was authorized to telework from a substance abuse rehabilitation center from October 2019 to May 2020, which is allowed under the collective bargaining agreement and applicable regulations. The investigation determined that the GS-13 employee improperly received one week of regular pay while incarcerated at a detention center and that the timesheet was certified using an administrative EPA headquarters code associated with the 2018–2019 government shutdown. The allegation of false statements was not supported. There was also an allegation that the GS-13 employee received regular pay while on leave without pay. That allegation was supported. Based on the investigation, the GS-13 employee was issued a debt letter to recover the funds.

CASE NUMBER: OI-HQ-2019-ADM-0088

An EPA SES employee allegedly authorized a GS-15 employee to maintain an off-the-books compensatory time record log. The investigation determined that the allegation was over 12 years old. The allegation was not supported. It was also alleged that the EPA SES employee misused an EPA government vehicle by transporting a family member and pet in the government vehicle on several occasions, as well as transported a boat using a government vehicle. The investigation determined the actions by the employee were not willful; therefore, the allegations regarding the misuse of a government vehicle were not supported.

Appendix 5—Peer Reviews Conducted

For Reporting Period Ending September 30, 2020

Section 5(a)(14) of the Inspector General Act of 1978, as amended, requires an appendix containing the results of any peer review conducted of the EPA OIG by another OIG during the reporting period or, if no such peer review was conducted, a statement identifying the date of the last peer review conducted of the EPA OIG by another OIG. Section 5(a)(15) of the Inspector General Act requires a list of any outstanding recommendations from any peer review conducted of the EPA OIG by another OIG that have not been fully implemented. Section 5(a)(16) of the Inspector General Act requires a list of all peer reviews conducted by the EPA OIG of another OIG during the reporting period, including a list of any recommendations from any previous peer review that remain outstanding.

The EPA OIG did not conduct any peer reviews of other OIGs during the semiannual reporting period. The following are the most recent peer reviews conducted by another OIG of the EPA OIG. There are no outstanding recommendations from these peer reviews.

Audits

The most recent peer review report on the EPA OIG was issued on June 18, 2018, by the U.S. Department of Defense OIG. That review, covering the three-year period ending September 30, 2017, found that the EPA OIG's system of quality control was suitably designed and complied with to provide the EPA OIG with reasonable assurance of performing and reporting in conformity with applicable professional standards in all material respects. The EPA OIG received an external peer review rating of *pass*.

Investigations

The General Services Administration OIG completed the most recently mandated Council of the Inspectors General on Integrity and Efficiency quality assurance review of the EPA OIG Office of Investigations and issued its report on June 11, 2018. The General Services Administration identified no deficiencies and found internal safeguards and management procedures compliant with quality standards.

Appendix 6—OIG Mailing Addresses and Telephone Numbers

Headquarters

U.S. Environmental Protection Agency
Office of Inspector General
1200 Pennsylvania Ave., NW (2410T)
Washington, D.C. 20460
(202) 566-0847

Offices

Atlanta

U.S. Environmental Protection Agency
Office of Inspector General
61 Forsyth Street, SW
Atlanta, GA 30303
Audit/Evaluation: (404) 562-9830
Investigations: (404) 562-9857

Boston

U.S. Environmental Protection Agency
Office of Inspector General
5 Post Office Square (Mail Code: 15-1)
Boston, MA 02109-3912
Audit/Evaluation: (617) 918-1475
Investigations: (617) 918-1466

Chicago

U.S. Environmental Protection Agency
Office of Inspector General
77 West Jackson Boulevard
13th Floor (IA-13J)
Chicago, IL 60604
Audit/Evaluation: (312) 353-2486
Investigations: (312) 886-7167

Cincinnati

U.S. Environmental Protection Agency
Office of Inspector General
26 West Martin Luther King Drive
Cincinnati, OH 45268-7001
Audit/Evaluation: (513) 487-2363
Investigations: (212) 637-3040

Dallas

U.S. Environmental Protection Agency
Office of Inspector General – 4th Floor
1201 Elm Street
Dallas, TX 75270
Audit/Evaluation: (214) 665-6621
Investigations: (214) 665-2249

Denver

U.S. Environmental Protection Agency
Office of Inspector General
1595 Wynkoop Street, 4th Floor
Denver, CO 80202
Audit/Evaluation: (303) 312-6969
Investigations: (303) 312-6868

Kansas City

U.S. Environmental Protection Agency
Office of Inspector General
11201 Renner Boulevard
Lenexa, KS 66219
Audit/Evaluation: (913) 551-7878
Investigations: (913) 551-7420

New York

U.S. Environmental Protection Agency
Office of Inspector General
290 Broadway, Suite 1520
New York, NY 10007
Audit/Evaluation: (212) 637-3049
Investigations: (212) 637-3040

Philadelphia

U.S. Environmental Protection Agency
Office of Inspector General
1650 Arch Street, 3rd Floor
Philadelphia, PA 19103-2029
Audit/Evaluation: (215) 814-2326
Investigations: (215) 814-2470

Research Triangle Park

U.S. Environmental Protection Agency
Office of Inspector General
Mail Drop N283-01
Research Triangle Park, NC 27711
Audit/Evaluation: (919) 541-1030
Investigations: (919) 541-3668

San Francisco

U.S. Environmental Protection Agency
Office of Inspector General
75 Hawthorne Street (IGA-1-2)
8th Floor
San Francisco, CA 94105
Audit/Evaluation: (415) 947-4527
Investigations: (415) 947-4506

Seattle

U.S. Environmental Protection Agency
Office of Inspector General
Mail Code 17-H13
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3140
Audit/Evaluation: (206) 553-2999
Investigations: (206) 553-1273

The EPA OIG is unable to receive regular mail or faxes because of mandatory telework during the coronavirus pandemic. We are still able to receive and respond to phone calls.