



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

THE INSPECTOR GENERAL

December 29, 2020

The Honorable Russell T. Vought
Director
Office of Management and Budget
725 17th Street, NW
Washington, D.C. 20503

Dear Director Vought:

In response to the U.S. Chemical Safety and Hazard Investigation Board’s request, the Office of Inspector General for the U.S. Environmental Protection Agency—which also serves as the OIG for the CSB—completed an evaluation of the CSB’s compliance with Executive Order 13950, *Combating Race and Sex Stereotyping*. Specifically, in accordance with Section 6(c)(ii) of Executive Order 13950, the CSB requested that we thoroughly review and assess the CSB’s compliance with the Executive Order’s requirements and submit a report to the Office of Management and Budget by the end of calendar year 2020.

We conducted this evaluation in accordance with the *Quality Standards for Inspection and Evaluation* published in January 2012 by the Council of the Inspectors General on Integrity and Efficiency. Those standards require that we perform the evaluation to obtain sufficient, competent, and relevant evidence to provide a reasonable basis for our findings and conclusions based on our objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions. We assessed applicable guidance, including guidance from the Office of Management and Budget, the U.S. Office of Personnel Management, and the Council of Inspectors General on Integrity and Efficiency. In addition, we analyzed documents and communications that the CSB provided demonstrating the actions it took to comply with Executive Order 13950.

We found that the CSB is compliant with the requirements of Executive Order 13950 at this time. We only assessed the CSB’s compliance with the applicable requirements of the Executive Order.

Table 1: CSB compliance with Executive Order 13950 requirements

Executive Order 13950 Requirements	Compliant?
In accordance with Section 4(a), do selected contracts contain required language from Section 4?	YES ¹
In accordance with Sections 5(a)–(h), was the list of relevant grant programs submitted to the Office of Management and Budget by November 21, 2020?	YES ²
In accordance with Section 6(a)(i)–(ii), did the CSB ensure that agency trainings did not teach “divisive concepts” and did diversity and inclusion efforts encourage agency employees not to judge each other by any federally protected characteristic?	YES ³
In accordance with Section 6(c)(i), did the CSB issue an order incorporating the Executive Order into agency operations, including making Executive Order compliance a provision in all agency contracts for diversity training?	YES ^{1,3}
In accordance with Section 6(c)(ii), did the CSB make a request to the OIG to assess compliance with the Executive Order?	YES

Executive Order 13950 Requirements	Compliant?
In accordance with Section 6(c)(iii), did the CSB appoint a senior political appointee responsible for ensuring compliance with the Executive Order?	YES
In accordance with Section 7(a), did the CSB submit all diversity and inclusion trainings to the U.S. Office of Personnel Management for approval prior to using?	YES ³
In accordance with Section 7(b), did the CSB evaluate whether to pursue debarment for any contracts that violated the Executive Order?	YES ³
In accordance with Section 7(c), did the CSB report all fiscal year 2020 spending on training related to diversity or inclusion by December 21, 2020? Does it include an aggregate total, as well as by contractor?	YES
Is the CSB compliant or noncompliant?	COMPLIANT

Source: OIG analysis of Executive Order 13950 and CSB data. (EPA OIG table)

- ¹ The CSB did not enter into any new contracts in the relevant time frame of November 20–November 30, 2020.
- ² The CSB does not issue grants.
- ³ The CSB suspended all planned diversity and inclusion trainings as of November 9, 2020. The CSB did not provide any diversity and inclusion trainings in the 12 months prior to that date.

If you or your staff have any questions, please contact Katherine Trimble, assistant inspector general for Audit, at (202) 566-1007 or trimble.katherine@epa.gov.

Sincerely,

Sean W. O'Donnell

cc: Katherine A. Lemos, PhD, Chairperson and Chief Executive Officer, CSB
Christopher D. Gamache, Program Examiner, Environment Branch, Office of Management and Budget