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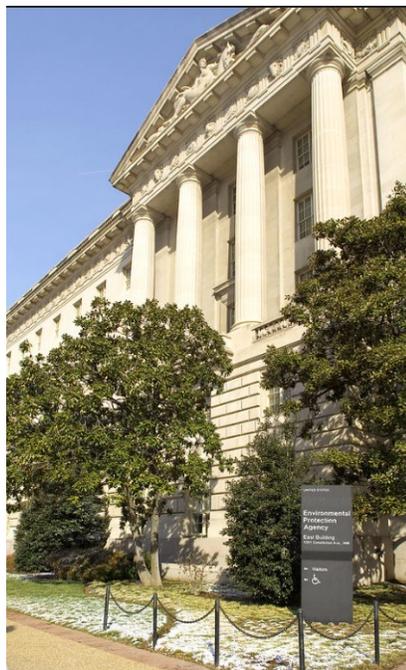
OFFICE OF INSPECTOR GENERAL

*Operating efficiently and effectively
Improving EPA research programs*

EPA Needs to Improve Oversight of Research Assistance Agreements

Report No. 20-P-0204

June 30, 2020



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Abbreviations

EPA	U.S. Environmental Protection Agency
NCER	National Center for Environmental Research
OIG	Office of Inspector General
ORD	Office of Research and Development
P3	People, Prosperity and the Planet
SOP	Standard Operating Procedure
STAR	Science to Achieve Results

Cover Photo: The U.S. Environmental Protection Agency headquarters offices.
(EPA images)

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At a Glance

Why We Did This Project

The U.S. Environmental Protection Agency's Office of Inspector General conducted this audit to determine whether (1) the Office of Research and Development oversees and monitors grants awarded to universities in accordance with applicable laws, regulations, policies, and procedures, and (2) university grantees are completing agreed-upon work that meets the defined purpose of the grant.

The purpose of post-award monitoring is to conduct oversight and monitor a recipient's performance and management of assistance agreements. There are two main programmatic oversight activities: baseline monitoring and advanced monitoring.

This report addresses the following:

- *Operating efficiently and effectively.*
- *Improving EPA research programs.*

This project addresses a key EPA [management challenge](#):

- *Improving data quality and filling identified data gaps.*

Address inquiries to our public affairs office at (202) 566-2391 or OIG_WEBCOMMENTS@epa.gov.

List of [OIG reports](#).

EPA Needs to Improve Oversight of Research Assistance Agreements

What We Found

Although the ORD has recently made improvements to its oversight of research assistance agreements, we found that project officers did not always complete baseline monitoring accurately or in a timely manner, enforce recipient compliance with progress reporting requirements, or document the review of recipient progress reports.

The EPA's lack of compliance with assistance agreement oversight requirements can put EPA research funds at risk.

In addition, of the 12 sampled assistance agreements, 11 were completed and final reports were submitted. Two of the 11 final recipient reports did not demonstrate that agreed-upon work was completed. Also, we found that the ORD is not consistently posting research assistance agreement results on its website.

Recommendations and Planned Agency Corrective Actions

We recommend that the assistant administrator for Research and Development:

- Verify that baseline monitoring and post-award monitoring responsibilities are completed accurately and in a timely manner.
- Require that project officers enforce recipient reporting requirements and document reviews of interim and final reports.
- Require that final report reviews include a narrative noting how the project officer determined that results were achieved.
- Verify that the Grantee Research Project Results website is updated and accurate.
- Provide training to all ORD project officers on required post-award monitoring responsibilities.
- Update and correct the Grantee Research Project Results website for missing and inaccurate information.
- Require that all abstracts, report summaries, and publications for all ORD research assistance agreements be placed on the EPA's website.

The EPA agreed with our recommendations and provided acceptable planned corrective actions and estimated completion dates. The recommendations are resolved with corrective actions pending.

Noteworthy Achievement

The ORD's National Center for Environmental Research developed and implemented a final report checklist following discussions with the OIG.



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

THE INSPECTOR GENERAL

June 30, 2020

MEMORANDUM

SUBJECT: EPA Needs to Improve Oversight of Research Assistance Agreements
Report No. 20-P-0204

FROM: Sean W. O'Donnell 

TO: Jennifer Orme-Zavaleta, Principal Deputy Assistant Administrator for Science
and EPA Science Advisor
Office of Research and Development

This is our report on the subject audit conducted by the Office of Inspector General of the U.S. Environmental Protection Agency. The project number for this audit was OA&E-FY18-0248. This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

The Office of Research and Development is responsible for the issues discussed in this report.

In accordance with EPA Manual 2750, your office provided acceptable corrective actions and estimated milestone dates in response to OIG recommendations. All recommendations are resolved and no final response to this report is required. However, if you submit a response, it will be posted on the OIG's website, along with our memorandum commenting on your response. Your response should be provided as an Adobe PDF file that complies with the accessibility requirements of Section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that you do not want to be released to the public; if your response contains such data, you should identify the data for redaction or removal along with corresponding justification.

We will post this report to our website at www.epa.gov/oig.

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Chapter 1

Introduction

Purpose

The U.S. Environmental Protection Agency’s Office of Inspector General conducted this audit to determine whether (1) the Office of Research and Development oversees and monitors grants awarded to universities, in accordance with applicable laws, regulations, policies, and procedures and (2) university grantees are completing agreed-upon work that meets the defined purpose of the grant.

Key Management Challenge

This audit addresses the following key management challenge for the Agency, as identified in OIG Report No. [19-N-0235](#), *Fiscal Year 2019 EPA Management Challenges*, issued July 15, 2019:

- Improving data quality and filling identified data gaps.

Background

Assistance agreements include grants and cooperative agreements. Grants and cooperative agreements are appropriate funding mechanisms for the Agency when the main purpose of the relationship is to support a public purpose authorized by federal statute and involves “transferring money, property, services, or anything of value to a recipient,” according to the EPA’s *Assistance Agreement Almanac*. Cooperative agreements are used when there is substantial involvement by EPA program personnel in the funded project. For the purpose of this audit, the recipients were higher learning institutions.

The Role of ORD

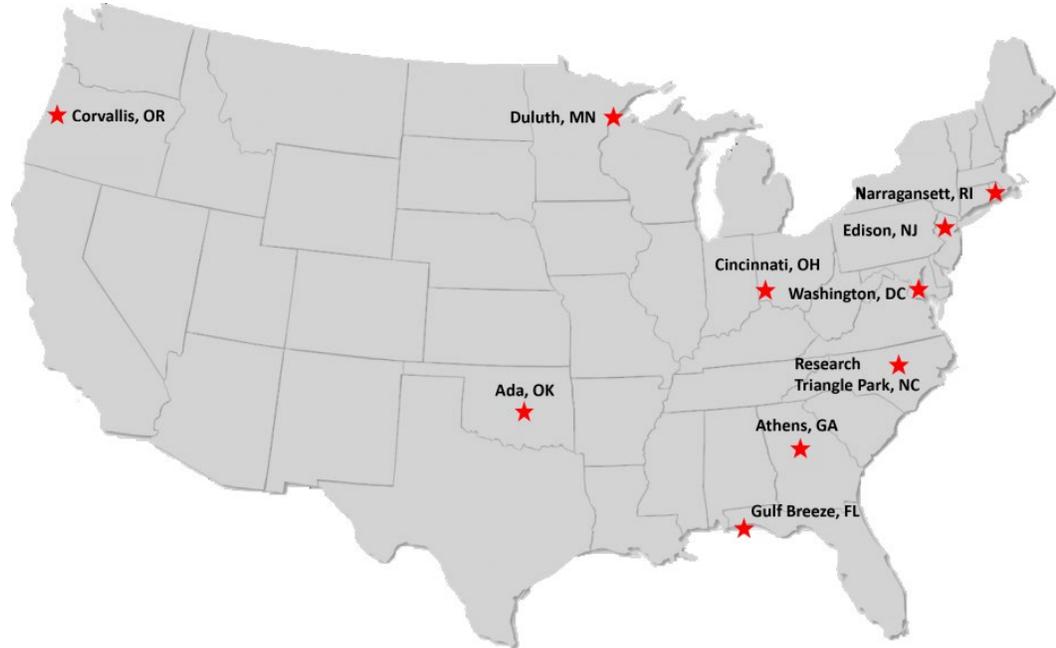
The ORD is the EPA’s scientific research arm, and its research is used to inform decisions and support the needs of Agency offices, partners, and stakeholders. Its work is grouped into six research programs to address the most pressing environmental health research needs:

- Air and Energy Research.
- Chemical Safety for Sustainable Research.
- Health and Environmental Risk Assessment.
- Homeland Security Research.
- Safe and Sustainable Water Resources Research.
- Sustainable and Healthy Communities Research.

The ORD reorganized in September 2019 and now has offices and centers in ten locations across the country, as shown in Figure 1. The reorganization changed the structure of the centers and laboratories to combine similar work and

remove “stovepipes.” Despite the reorganization, most staff are expected to perform the same work as they performed prior to the reorganization.

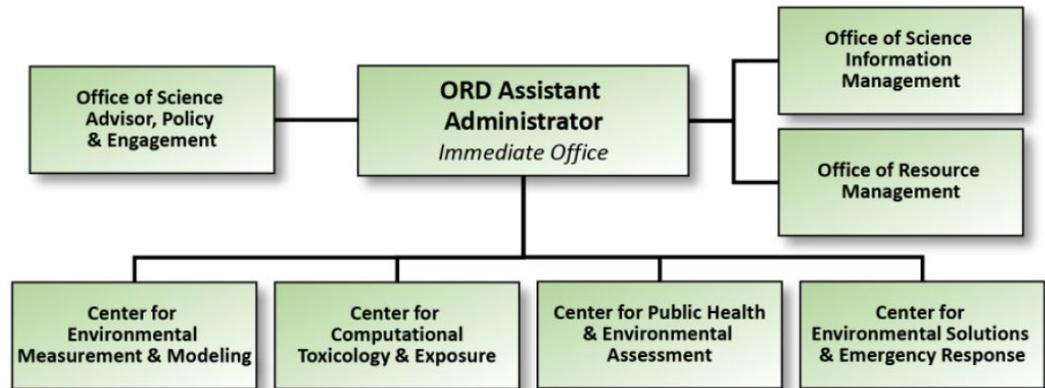
Figure 1: ORD office and research center locations



Source: EPA image modified by the OIG for accuracy.

In addition, as the national program manager for the EPA Regional Laboratories, the ORD is responsible for the strategic direction, budget, and performance of all the laboratories associated with each of the Agency’s regional offices. The ORD’s Immediate Office of the Assistant Administrator works with the Office of Science Information Management; the Office of Resource Management; the Office of Science Advisor, Policy and Engagement; and the four research centers (Figure 2).

Figure 2: ORD’s new organizational structure



Source: The EPA.

The ORD awards assistance agreements in the following research areas:

- Air.
- Climate change.
- Ecosystems.
- Health.
- Safer chemicals.
- Sustainability.
- Water.

The ORD requires that all research assistance agreement recipients submit summaries of their progress and final reports for posting on the EPA's website. These reports are maintained in a database that also includes the project abstracts. According to its website, the Agency does not review the principal investigator's conclusions published on the website because project abstracts, report summaries, and publications "convey the viewpoints of the principal investigator and may not represent the views and policies of ORD and EPA."

Post-Award Monitoring of Assistance Agreements

The purpose of post-award monitoring, conducted by the EPA project officers, is to conduct oversight of a recipient's performance and management of assistance agreements. Project officers are supervised by their program offices and are required to follow overarching Agency policies and procedures for post-award monitoring and oversight.

All assistance agreements have terms and conditions, such as:

- Information that must be reported by research recipients.
- When reports are to be submitted.
- Required summaries in a specific format to place on the EPA's website.
- "Sufficient progress" reference, which states that the EPA may terminate the assistance agreement if sufficient progress is not being made.

EPA Order 5700.7A1, *Environmental Results under EPA Assistance Agreements*, dated January 1, 2005, requires program offices to review both interim and final performance reports and document these reviews in the official project file.

The EPA's *Assistance Agreement Almanac* requires project officers to maintain records used for programmatic direction, such as correspondence and progress reports.

EPA Order 5700.6A2 CHG 2, *Policy on Compliance, Review and Monitoring*, dated September 24, 2007, outlines the two main post-award oversight activities: baseline monitoring and advanced monitoring. The policy requires the results of these monitoring activities to be recorded in the EPA’s Integrated Grants Management System databases—Post-Award and Grantee Compliance. The Post-Award Database records milestones, activities, and baseline monitoring by award number. The Grantee Compliance Database recorded and tracked advanced monitoring, as well as audits and reports that are tracked by recipient. The Agency replaced the Grantee Compliance Database with the Comply App database, which contains similar information but has some additional features, on July 1, 2019. The EPA’s policy still refers to the Grantee Compliance Database.

Project officers conduct baseline monitoring to evaluate the progress of work and whether the recipient of the funds has complied with the terms of the assistance agreement and applicable regulations. To do this, project officers determine whether:

- Progress reports have been received from the recipient.
- Expended funds are reasonable based on project duration and work plan.
- Unexpended funds are reasonable based on what is necessary to complete the project.
- The recipient is in compliance with applicable programmatic terms and conditions of the assistance agreement.

Project officers are responsible for conducting baseline monitoring unless they receive a waiver from the Office of Grants and Debarment for reasons such as unique programmatic considerations. The initial and subsequent baseline monitoring is dependent upon the length of the original project period (Table 1).

Table 1: Baseline monitoring requirements

Project period	Initial	Ongoing
18 months or less	Due within six months after award date.	Due within 12 months after most recent monitoring.
Over 18 months	Due within 12 months after award date.	Due within 12 months after most recent monitoring.

Source: EPA Order 5700.6A2 CHG 2.

Project officers can conduct additional baseline monitoring at any time based on amendments to the assistance agreement, receipt of progress reports, or a change in project officer. EPA policy requires project officers to record all baseline monitoring reports in the EPA’s Post-Award Database, or the baseline monitoring is considered not conducted.

The ORD’s National Center for Environmental Research, also known as the NCER, issued a *Procedure for Annual Progress Report Reviews and Baseline Monitoring Reports*, GM-005, dated July 7, 2017. It requires project officers to review recipient progress reports and complete an annual report checklist. It also

specifies actions that project officers must take when the recipient reports are delayed. Prior to the reorganization, this procedure and guidance were applicable only to the NCER because other ORD offices did not have specific grants management policies except for those provided by the Office of Grants and Debarment. Since the 2019 reorganization, the ORD is developing standard operating procedures pertaining to post-award monitoring, which will apply across the Office.

Advanced monitoring is an “in-depth assessment” of a project’s progress, which:

- Requires interaction with the recipient.
- Can be conducted at the recipient’s location or off-site.
- Produces a written report, which could include findings, recommended corrective actions, and a timeline for recipient response.

While EPA policy requires baseline monitoring for each award, advanced monitoring is not mandatory. The ORD annually develops a Post-Award Monitoring Plan, which identifies at least 10 percent of the active recipients for advanced monitoring during the calendar year. However, the ORD can conduct advanced monitoring for assistance agreements that are not in the plan. For example, project officers may request to conduct advanced monitoring if baseline monitoring results raise concerns or warrant a comprehensive review. Project officers can also substitute an advanced monitoring activity for a baseline monitoring activity if the advanced monitoring activity was conducted within 12 months of the last baseline activity. If advanced monitoring is conducted, those reports must be posted in Comply and the Post-Award Database.

The *ORD EPA Project Officer Post-Award Evaluation Protocol* was issued on January 8, 2008, and project officers were strongly recommended to use it during on-site and off-site reviews and when preparing trip reports. Effective April 18, 2018, the NCER made the protocol mandatory for its staff. As noted above, the ORD has been developing an SOP subsequent to its September 2019 reorganization that will be required for the entire organization.

Responsible Office

The ORD is responsible for the issues discussed in this report.

Noteworthy Achievements

The ORD’s NCER developed and implemented a final report checklist following a discussion with the OIG about the annual report checklist. The NCER had also determined that project officer performance standards will include an element for grants management regarding standards and documentation and that supervisors will review random project officer files.

Scope and Methodology

We conducted this performance audit from June 2018 through April 2020 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions.

To answer our objectives, we reviewed applicable regulations and EPA policies and procedures. We obtained a list of assistance agreements the ORD awarded that were active or closed out from October 1, 2014, through September 30, 2018 (fiscal years 2015 through 2018). We judgmentally selected 12 out of the 245 assistance agreements from FY 2015 through FY 2018:

- We selected two out of the 170 assistance agreements active from FY 2015 through FY 2018. See Appendix A, Samples 1 and 2, for more details.
- We selected ten out of the 75 assistance agreements that were closed during FY 2018. See Appendix A, Samples 3 through 12, for more details.

During our audit, we sampled assistance agreements that were awarded and monitored by one of the ORD research centers, the NCER, and two of ORD's laboratories: the National Health and Environmental Effects Research Laboratory and the National Risk Management Research Laboratory. As a result of the 2019 reorganization, these research centers and laboratories no longer exist in their previous forms.

We obtained documents from the ORD and the Integrated Grants Management System database. We interviewed management and staff within the ORD regarding oversight activities of assistance agreements.

Prior Reports

OIG Report No. [13-P-0361](#), *EPA Needs to Improve STAR Grant Oversight*, issued on August 27, 2013, found that project officers did not monitor Science to Achieve Results, known as STAR, grant recipients' assistance agreements in a manner consistent with the Agency's policy and guidance. The EPA reported that all corrective actions were completed.

OIG Report No. [16-P-0125](#), *EPA Offices Are Aware of the Agency's Science to Achieve Results Program, but Challenges Remain in Measuring and Internally Communicating Research Results That Advance the Agency's Mission*, issued on March 30, 2016, found that the ORD needs to enhance communication of STAR grant research results. The EPA reported that all corrective actions were completed.

Chapter 2

Baseline Monitoring Was Often Late and Sometimes Inaccurate

EPA policy requires baseline monitoring to be completed, but project officers have not always completed baseline monitoring accurately or in a timely manner. The ORD attributed the noncompliance to the high turnover of project officers who are hired as subject matter expert scientists and may not adequately focus on administrative tasks. Deficient monitoring increases the risk that recipients of assistance agreements will not meet their objectives, and it leaves the EPA an inaccurate record of recipient performance, putting taxpayer funds at risk.

EPA Requires Monitoring of Assistance Agreements

EPA Order 5700.6A2 CHG 2 requires project officers to conduct the initial baseline monitoring within 12 months of the award date for awards with a project period exceeding 18 months, and every 12 months thereafter. If the project period is less than 18 months, project officers are required to conduct baseline monitoring no more than six months after the award date. No matter the project period, project officers are responsible for conducting baseline monitoring at least annually. Project officers are required to post baseline monitoring reports in the Post-Award Database. Project officers can substitute advanced monitoring for baseline monitoring, provided it is documented in both Comply and the Post-Award Database.

In 2008, the ORD requested and received a baseline monitoring waiver from the Office of Grants and Debarment for all People, Prosperity and the Planet, known as P3, Phase I assistance agreements because these agreements receive a small amount of funding and normally have a one-year project period. The P3 awards provide funding for teams of college students to design environmental solutions for a sustainable future. The waiver requires the ORD to conduct baseline monitoring if the project period is extended beyond one year.

EPA Order 5700.7A1 refers to reporting performance, specifically:

All competitive funding announcements for assistance agreements must include ranking criteria for evaluating the applicant's past performance in reporting on outputs and outcomes.

Project Officers Did Not Comply with Monitoring Requirements

We found that project officers were late in completing baseline monitoring reports for almost half of the sampled assistance agreements. In some instances, the reports were inaccurate. For our sample of 12 research assistance agreements, ten required baseline monitoring because the other two were P3 Phase I and under a waiver. The project officers for eight of those ten assistance agreements (80 percent) did not complete at least one baseline monitoring report by the required due date. We found baseline monitoring reports ranged from nine to 596 days late (Table 2).

Table 2: Missing and late baseline monitoring reports for FY 2015–FY 2018

Sample number	How many were required?	How many were completed?	How many were late?	How late was each overdue report?
1	3	3	2	<ul style="list-style-type: none"> • 9 days • 35 days
2	3	2	2	<ul style="list-style-type: none"> • 20 days • 199 days
3	3	3	1	<ul style="list-style-type: none"> • 122 days
4	2	2	2	<ul style="list-style-type: none"> • 54 days • 68 days
5	4	4	0	-
6	2	2	1	<ul style="list-style-type: none"> • 200 days
7	3	4 ^a	0	-
8	2	1	1	<ul style="list-style-type: none"> • 200 days
9	3	3	1	<ul style="list-style-type: none"> • 13 days
10	2	1	1	<ul style="list-style-type: none"> • 596 days
Total	27	24	11	
Percent		89%	46%	

Source: OIG analysis of reporting requirements and EPA's monitoring records.

^a Project officer completed four baselines although only three were required.

In addition, we found project officers had inaccurately noted on some of the baseline monitoring reports that there were no issues with progress reports, despite recipients not submitting them in a timely manner or including the required annual summaries. As a result, the Agency may not have been aware of project status or difficulties. For example:

- In one baseline monitoring report completed on January 25, 2018, the project officer noted that the recipient was compliant with applicable programmatic terms and conditions and had submitted progress reports as required. However, we found that the recipient was more than five months late in submitting a progress report that was originally due on June 30, 2017.
- Another project officer reported in the baseline monitoring report, completed on May 4, 2017, that the recipient submitted progress reports as required. However, we found the recipient had not, at the time the Agency

completed its baseline monitoring report, submitted the annual progress report that was originally due on September 28, 2016. In fact, the recipient submitted the annual progress report on August 30, 2017, almost a year after the due date.

During our audit, ORD management recognized grants management as an area for improvement. The NCER was responsible for the majority of ORD assistance agreement awards prior to the Office's reorganization. According to the ORD, starting February 2019, NCER management began reviewing post-award monitoring status reports to address monitoring concerns during monthly business review meetings as well as identify any issues with post-award monitoring deadlines. Also starting in FY 2019, according to the ORD, NCER management included grants management in project officers' performance standards—such as adhering to standards, requirements, and policies for supporting documentation. Results of supervisory reviews would help identify missing file contents, project officer training needs, and topics to include in regular project officer meetings. However, we noted that the ORD had not yet instituted internal controls to address inaccurate baseline monitoring.

Staff Turnover and Lack of Administrative Focus Lead to Higher Risk

ORD management attributed the delays and inaccuracies in completing baseline monitoring reports to increased turnover due to retirements and having fewer project officers. Also, ORD management stated that project officers are hired as subject matter expert scientists who may not adequately focus on administrative tasks. However, this lack of focus on administrative tasks makes it critical for the ORD to establish and enforce strong internal controls. Baseline and advanced monitoring of assistance agreements provide direct oversight of federal dollars to verify that they are properly spent. Deficient monitoring increases the risk that assistance agreement recipients will not meet their objectives and that taxpayer funds may be subject to waste, fraud, and abuse.

When project officers do not accurately document recipients' performance, the EPA will not have an accurate record of performance information to aid in future competitive assistance agreements awards. The EPA's *Grants Competition Advocate's Guidance on the Evaluation of Applicants Past Performance in Managing Grants and Reporting on Outputs and Outcomes*, dated January 2014, states that to evaluate past performance, the EPA should focus on evaluating how well applicants documented or reported their progress toward achieving expected outputs and outcomes under prior assistance agreements, such as filing timely progress and final reports.

Furthermore, without EPA project officer oversight, these recipients might not be aware that they have performance issues to disclose in future applications. As a result, recipients with undocumented performance issues may be unfairly

considered for future awards over applicants without negative performance histories.

Recommendation

We recommend that the assistant administrator for Research and Development:

1. Implement additional internal controls across the Office of Research and Development to verify project officers complete baseline monitoring and post-award monitoring responsibilities accurately and in a timely manner.

Agency Response and OIG Assessment

The Agency concurred with Recommendation 1. The ORD will implement additional internal controls by developing and implementing an SOP for all ORD assistance agreements that will codify how to accurately complete and document baseline and post-award monitoring and will include timeliness metrics. Project officers will be evaluated for their adherence with the SOP and monitoring due dates during the annual performance appraisal cycle. The development and implementation of the procedure and verification of compliance are internal controls that meet the intent of the recommendation. The EPA provided an estimated completion date of October 1, 2020. We consider this recommendation resolved with corrective action pending. See Appendix B for the Agency's response to the draft report.

Chapter 3

EPA Did Not Consistently Require Timely Progress Reports and Did Not Always Document Reviews

Project officers did not always enforce recipient compliance with progress reporting requirements, and the program office did not always document reviews of recipient progress reports. Although EPA policy and award agreements require recipient reporting and EPA review of reports, the Agency does not have adequate controls to verify that those steps take place. When project officers do not enforce recipient reporting requirements, the Agency may not be able to determine whether sufficient progress is being made. Also, when program offices do not document reviews of progress reports, it is unknown if the program offices reviewed progress reports as required.

EPA Requirements for Recipient Progress Report Submission and Program Office Review

EPA award agreements include a condition that specifies when reports are due and requires research recipients to report on specific elements regarding their progress. Depending on the type of assistance agreement awarded, recipient progress report due dates vary (Table 3).

Table 3: Sampled research assistance agreement reporting requirements

Assistance program	Progress reports	Final report
P3 Phase I	March	None
STAR	Annually	Within 90 days of expiration date
Consolidated research	Quarterly or annually	Within 90 days of expiration date

Source: OIG analysis of reporting requirements.

Since January 2014, the EPA’s “General Terms and Conditions” states that the EPA may terminate the assistance agreement if the Agency determines there is a “failure to ensure reasonable completion of the project within the project period.”

Since September 2013, the “EPA Research and Related Agency Specific Requirements” has included the following statement:

EPA may withhold payment if progress reports are not submitted by the due date. In addition, if EPA determines that the recipient has not made sufficient progress toward completing its research, EPA may terminate the assistance agreement.

“EPA Research and Related Agency Specific Requirements” are not applicable to research centers, conferences, training projects, fellowships, or P3 awards.

EPA Order 5700.7A1 requires program offices to review both interim and final performance reports and document them in the official project file. Additionally, the EPA's *Assistance Agreement Almanac* requires project officers to maintain records of documents used for programmatic direction, such as correspondence and progress reports.

The NCER's GM-005 requires project officers to complete an annual report checklist. This procedure was updated on August 1, 2019, to include a final report checklist. As a result of the 2019 reorganization, the ORD is developing SOPs for post-award monitoring, which will apply across the Office.

Project Officers Did Not Enforce Recipient Reporting Requirements

We found that nine out of 12 (75 percent) sampled assistance agreements had at least one late or missing report. Seven of those nine recipients (78 percent) requested project period extensions to complete their work. With late or missing reports, recipients may not have informed EPA project officers in a timely manner of any potential delays or obstacles in completing grant objectives or work (Table 4).

Table 4: Sampled research assistance agreement reporting

Sample number	Reports required	Reports submitted	Late reports	Days late	Reports with missing elements	Time extensions awarded
1	4	4	3	<ul style="list-style-type: none"> • 3 • 1 • 2 	4	1
2	3	3	2	<ul style="list-style-type: none"> • 165 • 26 	3	0
3	3	3	2	<ul style="list-style-type: none"> • 711 • 134 	1	2
4	4	4	4	<ul style="list-style-type: none"> • 59 • 19 • 146 • 1 	4	1
5	4	2	1	<ul style="list-style-type: none"> • 26 	0	1
6	4	3	2	<ul style="list-style-type: none"> • 34 • 32 	3	1
7	3	3	1	<ul style="list-style-type: none"> • 336 	3	2
8	11	5	4	<ul style="list-style-type: none"> • 48 • 97 • 88 • 69 	5	0
9	4	4	4	<ul style="list-style-type: none"> • 761 • 165 • 43 • 2 	4	1
10	1	2	0	<ul style="list-style-type: none"> • - 	0	2
11	1	1	0	<ul style="list-style-type: none"> • - 	0	0
12	1	1	0	<ul style="list-style-type: none"> • - 	0	0
Total	43	35 (81%)	23 (66%)	1–761 days (range)	27	11

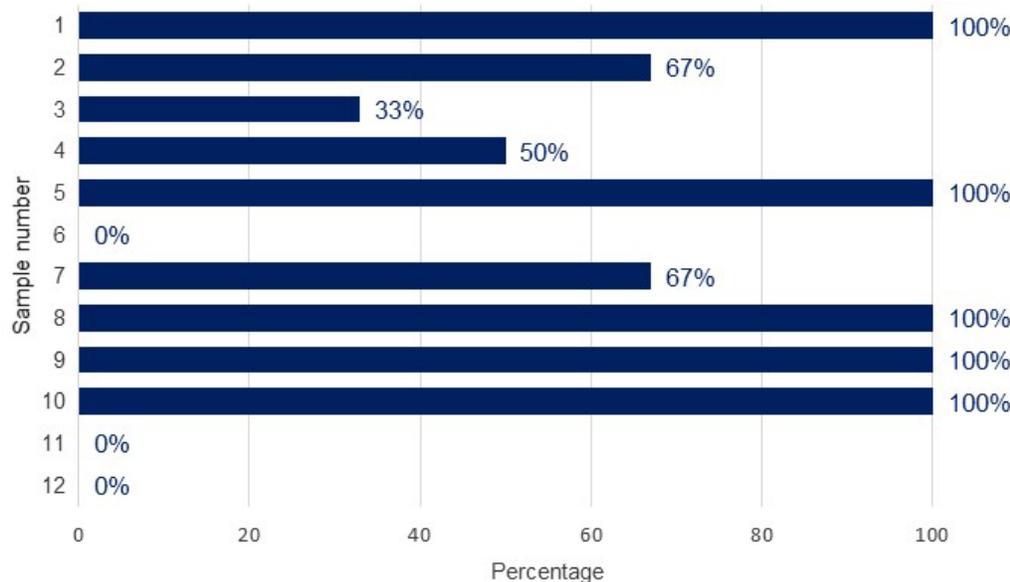
Source: OIG analysis of sampled assistance agreement files for report oversight, October 2014–September 2018.

Project officers did not enforce recipient reporting requirements for submission dates and reporting elements. Also, some recipients have requested and received extensions or additional funds without explaining such requests in the project reports. For example:

- One recipient was required to submit quarterly reports that included progress, results, and planned activities. However, the submitted reports only included expenditure information, student names, faculty advisors, and EPA mentors. In addition, one report covered a 12-month period, which did not comply with the requirement to submit quarterly reports.
- For another recipient, the project officer discovered that an annual progress report was missing when preparing to close out the assistance agreement, more than one year after the annual progress report was due. The project officer followed up with the recipient about the missing report, and the recipient submitted it almost two years after it was due.
- One recipient did not submit the annual report summary, which is required in addition to the annual progress report. The project officer did not discover the missing summary until preparing to upload it to the NCER’s website after it was due. The project officer followed up with the recipient, and the recipient submitted it more than two years after it was due.

Not only did recipients submit their progress reports late according to the reporting requirements of the award agreement, but the EPA program office also did not always document its reviews of these reports as required by EPA Order 5700.7A1 (Figure 3).

Figure 3: Percent of reports with documented reviews for sampled assistance agreements



Source: OIG analysis of ORD documentation.

Prior to the issuance of GM-005, project officers were only required to print a copy of the progress report and annotate it with their signature or initials and the date. As of July 7, 2017, the ORD's NCER instituted an annual report review checklist for NCER assistance agreements. Three of the progress reports were received after that, but the project officers did not complete the new required checklist.

Lack of Adequate Controls Increases Agency Risk

The EPA does not have adequate controls to verify that project officers are enforcing recipient reporting requirements such as submission dates, required reporting elements, and an annual summary format. The NCER project officers did not complete the required checklists for reasons such as lack of training.

When the ORD does not enforce reporting requirements, it increases the risk that the Agency will be unaware of project delays and lack of progress. Project officers should enforce terms and conditions such as withholding payment for late reports or terminating the assistance agreement due to lack of progress.

Recommendations

We recommend that the assistant administrator for Research and Development:

2. Develop and implement an Office of Research and Development policy establishing internal controls to enforce recipient reporting requirements and document project officer reviews of interim and final reports.
3. Provide training to all Office of Research and Development project officers on required post-award monitoring responsibilities.

Agency Response and OIG Assessment

The Agency concurred with Recommendations 2 and 3.

For Recommendation 2, the ORD will revise the interim and final report checklist to detail proper documentation of the reviews conducted by the project officers to ensure all goals are met. This will be codified—or implemented—in an SOP. The procedure will apply to all ORD project officers who manage assistance agreements. Adherence with the procedure will be evaluated as part of the project officers' annual performance review cycle. The OIG has reviewed the checklist and finds that the development and implementation of the procedure and the verification of compliance are internal controls that meet the intent of the recommendation.

For Recommendation 3, the ORD will develop and deploy project officer training on post-award monitoring requirements and responsibilities, including

recommendations from this report. During a meeting with the OIG on May 13, 2020, the ORD confirmed that the training is mandatory and attendance will be tracked.

The EPA provided an estimated completion date of October 1, 2020, for both recommendations. We consider these recommendations to be resolved with corrective actions pending. See Appendix B for the Agency's response to the draft report.

Chapter 4

Agreed-Upon Work Not Always Completed

Of the 12 sampled assistance agreements, 11 were completed and required final reports. One of the sampled assistance agreements has a project end date of March 31, 2022. However, two of the 11 sampled final reports—encompassing \$1.8 million—did not demonstrate that agreed-upon work was completed. Program offices are required to review performance reports to determine whether the recipient achieved outputs and outcomes, and project officers must certify at closeout that all required programmatic work has been satisfactorily completed. The project officers’ lack of oversight and incomplete documentation resulted in closeout decisions that could not always be supported. The EPA does not have assurance that tax dollars have been spent wisely when final reports do not clearly discuss successes and failures, and project officers do not include a narrative with closeout certifications.

Review of Results and Closeout Certification Are Required

EPA Order 5700.7A1 requires program offices to review both interim and final performance reports to determine whether the recipient achieved outputs and outcomes per the assistance agreement work plan. Work plan documents should specify outputs and outcomes for each assistance agreement.

EPA Order 5700.6A2 CHG 2 states that at the completion of an assistance agreement, project officers must “certify that all programmatic terms and conditions are met.” Also, the EPA has developed a Project Officer Closeout Certification form that requires the project officer to certify that required programmatic work was satisfactorily completed.

Final Reports Did Not Always Show Work Was Completed

As shown in Figure 4, the final reports for two out of the 11 sampled assistance agreements did not demonstrate that agreed-upon work was accomplished.

Figure 4: OIG analysis of final reports



Source: OIG analysis of recipient final reports.

The two reports include the following:

- One recipient's goal was to end hunger, homelessness, and unemployment among veterans by developing an aquaponics demonstration unit that combines aquaculture and hydroponics to raise fish and grow vegetables. The recipient experienced setbacks and was not able to complete and test the demonstration unit as expected in the first phase of the one-year P3 agreement. Therefore, the work was only partially complete despite the project officer's certification and acceptance of the final technical report.
- A training program was designed to produce environmental scientists and engineers through educational experiences at a federal research facility. In the program, undergraduate and graduate students worked at an EPA laboratory. The recipient only included limited information in the final report and did not include required elements such as project activities over the entire funding period, achievements, or technical details of the project, both positive and negative. It was unclear whether agreed-upon work was completed. Despite the lack of formal, required documentation, the project officer answered "yes" on the closeout certification in response to the question as to whether programmatic work was satisfactorily completed.

Lack of Oversight Contributes to Unsupported Closeouts

The project officers' lack of oversight and incomplete records resulted in closeout decisions that cannot always be supported or lacked required documentation. The ORD, however, explained that project officers may rely on progress reports and attend annual meetings to monitor research progress. We concur that review of progress reports and attendance at meetings may enable oversight, but those actions, if they occurred, were not documented.

According to the ORD, research assistance agreement recipients may not accomplish all tasks. The ORD stated that:

Research grants are made to carefully selected investigators to explore questions and generate new insights. Most planned tasks are completed. Some tasks don't work out the way we expect, but we still learn something from trying...Project Officers are trained as scientists and work with [Principal Investigators] to understand the successes and "failures" and help identify the lessons to be learned from the on-going research.

We agree with the ORD's view that research objectives may embrace broad and sweeping goals, such as new insights and lessons learned. However, we maintain that it is especially important for final report reviews to be comprehensive enough to determine whether recipients achieved objectives and captured lessons learned when tasks are not completed.

The ORD NCER's procedures do not address final report reviews. While the OIG concluded that the ORD's annual report checklist was helpful, we noted that there was not a similar checklist for final reports. The OIG discussed this with the ORD, who then updated the NCER's GM-005 on August 1, 2019. The updated GM-005 incorporated a final report checklist, but it does not require a narrative. The ORD stated that due to the reorganization, it is developing SOPs for post-award monitoring that will apply across the Office. Also, the ORD noted that the upcoming reorganization is expected to provide increased stability and continuity for project officers, as well as better workload oversight and work practice consistency.

When it is unclear whether results have been achieved, the EPA cannot assure that tax dollars have been spent wisely. Some research assistance agreements exceed five years, and with project officer turnover and minimal documentation, it is difficult to determine the results obtained from the funded research. As a result, clear and complete documentation is especially important.

Recommendation

We recommend that the assistant administrator for Research and Development:

4. Implement controls throughout the Office of Research and Development to require that final report reviews include a narrative noting how the project officer determined that results were achieved.

Agency Response and OIG Assessment

The Agency concurred with Recommendation 4. The ORD will implement a control by revising the interim and final report checklist to include guidance that specifies how project officers are to “document their evaluation of final and interim reports to ensure that goals are met.” The checklist and guidance will be codified—or implemented—in an SOP that will apply to all ORD project officers who manage assistance agreements. Adherence with the procedure will be evaluated as part of the project officers' annual performance review cycle. During a meeting with the OIG on May 13, 2020, the ORD confirmed that the checklist will include a required narrative field. The SOP, required narrative, and verification of compliance are internal controls that meet the intent of the recommendation. The EPA provided an estimated completion date of October 1, 2020. We consider this recommendation to be resolved with corrective actions pending. See Appendix B for the Agency's response to the draft report.

Chapter 5

Transparency of Research Results Needs Improvement

The ORD is not consistently reporting research assistance agreement results on its website. The *FY 2018–2022 U.S. EPA Strategic Plan* states that the Agency “will increase transparency with industry, environmental groups, and other stakeholders.” According to ORD management, a backlog to post information on the website was formed after an open position was not immediately filled. The EPA is not being completely transparent when its website does not make relevant information available to the public.

EPA Committed to Transparency

Objective 2.2 of the Strategic Plan, “Increase Transparency and Public Participation,” states that the “EPA will increase transparency with industry, environmental groups, and other stakeholders.” In addition, the EPA’s programmatic reporting conditions require recipients to submit report summaries to place on the EPA’s website.

ORD’s Website Does Not Have Complete and Accurate Information

The ORD is not consistently reporting research results on its public website. It places only NCER project abstracts, annual and final report summaries, and lists of publications onto the Grantee Research Project Results website. This is despite the fact that the ORD requires all recipients to submit report summaries. Of the 12 assistance agreements we sampled, six were missing report summaries or had inaccurate information on the website (Table 5).

Table 5: FY 2015–2018 research report summaries missing from website

Sample number	Information found on website				Explanation
	Project abstracts	Annual report	Final report	Publication lists	
1	✓	✓	✓	✓	N/A
2	✗	✗	N/A	✗	Nothing on website on 10/24/19. Added later. ^a
3	✓	✗	✗	✓	Missing 2016 and final report summaries for individual subprojects.
4	✓	✓	✓	✓	N/A
5	✓	✗	✓	✓	2016 report summaries for individual subprojects missing.
6	✓	✓	✓	✓	N/A
7	✓	✓	✓	✓	N/A

Sample number	Information found on website				Explanation
	Project abstracts	Annual report	Final report	Publication lists	
8	X	N/A	X	X	Nothing on website on 10/24/19. Added later. ^a
9	✓	✓	✓	X	Publication linked to assistance agreement but not EPA-funded.
10	✓	✓	X	N/A	Recipient submitted two reports; website includes three.
11	✓	N/A	✓	N/A	N/A
12	✓	N/A	✓	N/A	N/A

Source: OIG analysis of recipient reports and website (✓ = found on website; X = missing or inaccurate).

^a The Grantee Research Projects Results website only includes abstracts, report summaries, and publications for the NCER's assistance agreements. There is no website for the results of the National Health and Environmental Effects Research Laboratory and National Risk Management Research Laboratory assistance agreements.

For example, the 2016 annual assistance agreement report summary was missing for the main research center as well as the individual subprojects of the main research center. The EPA website was partially corrected after we notified the ORD of the discrepancy. The ORD added the main research center report summary, but the report summaries for the individual subprojects were not added to the website. As a result, it appears that report summaries were not provided in 2016 for individual subprojects.

Public Website Challenges Lessened Transparency

According to ORD management, a backlog was created after the website manager retired. The ORD pushed to update the website after the new person was hired, but the backlog was long at that point. The OIG noted that the abstracts and results of the National Health and Environmental Effects Research Laboratory and National Risk Management Research Laboratory assistance agreements were not on the website, and they have since been added. The EPA is not being completely transparent when its website does not make relevant information available to the public.

Recommendations

We recommend that the assistant administrator for Research and Development:

5. Develop and implement a policy that includes internal controls to semiannually verify that the Grantee Research Project Results website is up-to-date and accurate.

6. Update and correct the Grantee Research Project Results website for missing and inaccurate information.
7. Require all abstracts, report summaries, and publications for all Office of Research and Development research assistance agreements be placed on the EPA's website.

Agency Response and OIG Assessment

The Agency concurred with Recommendations 5, 6, and 7.

For Recommendation 5, the ORD is developing a new policy to update the Grantee Research Project Results website within 120 days of the project period end. In addition, a monthly report of upcoming and late website updates is created and provided to ORD project officers and supervisors. The monthly report was developed in response to our audit. Adherence with the policy will be evaluated as part of the project officers' annual performance review cycle. The development of the policy and verification of compliance are internal controls that meet the intent of the recommendation.

For Recommendation 6, the ORD stated that all of its active grants were updated and accurate on the Grantee Research Project Results website. As noted above, the ORD is developing a policy and created a monthly report to verify the website is up to date within 120 days of the project period end. During a meeting with the OIG on May 13, 2020, the ORD confirmed the missing and inaccurate information identified in this report will be corrected on the website.

For Recommendation 7, the ORD will ensure abstracts and report summaries are uploaded within 120 days of the end of the project period.

During a meeting with the OIG on May 13, 2020, the ORD confirmed that the website policy will be codified. The ORD also clarified that the website would be updated within 120 days of the end of each project reporting period.

The EPA initially provided an estimated completion date of July 1, 2020, for these three recommendations. In a June 1, 2020 email, the EPA provided an updated completion date of October 1, 2020. We consider these recommendations resolved with corrective actions pending. See Appendix B for the Agency's response to the draft report.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS

Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Potential Monetary Benefits (in \$000s)
1	10	Implement additional internal controls across the Office of Research and Development to verify project officers complete baseline monitoring and post-award monitoring responsibilities accurately and in a timely manner.	R	Assistant Administrator for Research and Development	10/1/20	
2	14	Develop and implement an Office of Research and Development policy establishing internal controls to enforce recipient reporting requirements and document project officer reviews of interim and final reports.	R	Assistant Administrator for Research and Development	10/1/20	
3	14	Provide training to all Office of Research and Development project officers on required post-award monitoring responsibilities.	R	Assistant Administrator for Research and Development	10/1/20	
4	18	Implement controls throughout the Office of Research and Development to require that final report reviews include a narrative noting how the project officer determined that results were achieved.	R	Assistant Administrator for Research and Development	10/1/20	
5	20	Develop and implement a policy that includes internal controls to semiannually verify that the Grantee Research Project Results website is up-to-date and accurate.	R	Assistant Administrator for Research and Development	10/1/20	
6	21	Update and correct the Grantee Research Project Results website for missing and inaccurate information.	R	Assistant Administrator for Research and Development	10/1/20	
7	21	Require all abstracts, report summaries, and publications for all Office of Research and Development research assistance agreements be placed on the EPA's website.	R	Assistant Administrator for Research and Development	10/1/20	

¹ C = Corrective action completed.

R = Recommendation resolved with corrective action pending.

U = Recommendation unresolved with resolution efforts in progress.

ORD Assistance Agreements Reviewed by OIG

Sample number	Award number	Applicant	Project title	Assistance program	ORD office	Start date	End date	Award amount	Closeout date
1	83575201	University of Colorado	Climate Change in Colorado: Weatherization and Indoor Air	STAR	NCER	11/01/14	06/30/18	\$999,889	4/9/19
2	83578501	University of North Carolina at Chapel Hill	Human Health Effects of Environmental Pollution	Consolidated Research	National Health and Environmental Effects Research Library	04/01/15	03/31/22	5,327,650	Not closed
3	83451301	University of California, Berkeley	University of California Berkeley – Children’s Environmental Health Research	STAR	NCER	08/01/09	07/31/17	3,585,482	8/7/18
4	83543801	Colorado State University	Climate & Health Benefits of Improved Cookstoves	STAR	NCER	09/01/13	08/31/17	1,511,072	5/14/18
5	83479901	Emory University	Emory/Georgia Tech Collaborative: Assessment – Health Effects	STAR	NCER	01/01/11	12/31/16	7,999,356	3/16/18
6	83479701	Michigan State University	Michigan State University – GLACIER	STAR	NCER	01/01/11	12/31/16	7,994,014	3/7/18
7	83528401	University of Maryland College Park	Community Stormwater Management for Chesapeake Bay	STAR	NCER	07/01/12	06/30/17	647,496	10/12/17
8	83558601	University of Cincinnati	Research Training for College & University Students	Consolidated Research	National Risk Management Research Library	05/01/14	04/30/17	1,799,704	2/22/18
9	83555401	Trustees of the University of Pennsylvania	Enabling Green Infrastructure Investment in Philadelphia	STAR	NCER	11/01/13	10/31/17	979,246	6/23/18
10	83571301	John Brown University	Development of an Affordable Solar Thermal Pasteurizer	P3	NCER	09/01/14	08/31/17	14,520	3/23/18
11	83676501	Fashion Institute of Technology	Threading the Needle: Composting to Colorants	P3	NCER	10/01/16	09/30/17	15,000	4/24/18
12	83612801	Georgia Tech Research Corporation	Sustainable Aquaponic Systems for Inner Cities	P3	NCER	11/01/15	10/31/18	15,000	3/20/18

Source: EPA assistance agreement data.

Agency Response to Draft Report

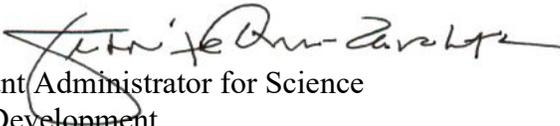


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 1, 2020

MEMORANDUM

SUBJECT: Response to Office of Inspector General (OIG) Draft Report No. OA&E-FY18-0248 "EPA Needs to Improve Oversight of Research Assistance Agreements" dated April 8, 2020

FROM: Jennifer Orme-Zavaleta 
Principal Deputy Assistant Administrator for Science
Office of Research and Development

TO: Sean W. O'Donnell
Inspector General
Office of Inspector General

The EPA's Office of Research and Development (ORD) appreciates the opportunity to review and comment on the OIG's Draft Report titled "EPA Needs to Improve Oversight of Research Assistance Agreements" (Project No. OA&E-FY18-0248 Draft Report).

We are grateful for the OIG's acknowledgement that ORD has made significant improvements in its oversight of assistance agreements. The notable achievements identified in the report by the National Center for Environmental Research (NCER) have been expanded and improved upon in the new ORD organizational structure following the ORD reorganization in October of 2019. Management of federal resources is critically important to ORD, and we welcome the OIG recommendations to ensure that our grant program is fiscally responsible, scientifically sound, and administered with the highest degree of integrity.

Our comments and suggestions are intended to promote accuracy and clarity of the final product. Immediately below are ORD's responses to the OIG's specific recommendations identified in the draft report. The attachment provides additional detailed comments, including specific language suggestions and recommendations to improve accuracy.

Recommendation 1: Implement additional internal controls across the Office of Research and Development to verify project officers complete baseline monitoring and post-award monitoring responsibilities accurately and in a timely manner.

Response 1: ORD concurs with this recommendation and proposes the following corrective action and completion date.

Corrective Action 1: ORD will develop and implement a standard operating procedure (SOP) that codifies how to accurately complete and document baseline and post-award monitoring including metrics for timeliness. This SOP will apply to all assistance agreements managed throughout ORD. A quarterly report will be utilized by project officers and their supervisors to identify upcoming baseline monitoring and post-award monitoring due dates for verification of timeliness. The degree to which project officers adhere to the SOP and due dates will be evaluated as part of the annual PARS cycle.

Planned Completion Date: October 1, 2020

Recommendation 2: Develop and implement an Office of Research and Development policy establishing internal controls to enforce recipient reporting requirements and document project officer reviews of interim and final reports.

ORD Response 2: ORD concurs with this recommendation and proposes the following corrective action and completion date.

Corrective Action 2: ORD has already developed a checklist that specifies reporting requirements for interim and final reports. This checklist will be revised to also specify proper documentation of project officer reviews ensuring all goals are met. This checklist and guidance will be codified in an SOP that will apply to all project officers managing assistance agreements in ORD. The degree to which project officers adhere to the SOP will be evaluated as part of the annual PARS cycle.

Planned Completion Date: October 1, 2020

Recommendation 3: Provide training to all Office of Research and Development project officers on required post-award monitoring responsibilities.

ORD Response 3: ORD concurs with this recommendation and proposes the following corrective action and completion date.

Corrective Action 3: ORD will develop and deploy training for project officers on the requirements and responsibilities associated with post-award monitoring. In addition, the

training will cover the recommendations outlined in the draft OIG report including standard operating procedures developed in response to those recommendations.

Planned Completion Date: October 1, 2020

Recommendation 4: Implement controls throughout the Office of Research and Development to require that final report reviews include a narrative noting how the project officer determined that results were achieved.

ORD Response: ORD concurs with this recommendation and proposes the following corrective action and completion date.

Corrective action 4: As described in Corrective Action 2, the checklist developed to evaluate final and interim reports will include guidance specifying how project officers should document their evaluation of final and interim reports to ensure that goals are met. The degree to which project officers adhere to the SOP will be evaluated as part of the annual PARS cycle.

Planned Completion Date: October 1, 2020

Recommendation 5: Develop and implement a policy that includes internal controls to semiannually verify that the Grantee Research Project Results website is up-to-date and accurate.

ORD Response: ORD concurs with this recommendation and proposes the following corrective action and completion date.

Corrective Action 5: ORD developed a policy that Grantee Research Project Results are updated within 120 days of the end of a grant project period. A monthly report is created that identifies upcoming and late website updates. The monthly report will be shared with ORD project officers and their supervisors. The degree to which project officers adhere to the SOP will be evaluated as part of the annual PARS cycle.

Planned Completion Date: July 1, 2020

Recommendation 6: Update and correct the Grantee Research Project Results website for missing and inaccurate information.

ORD Response: ORD concurs with this recommendation and proposes the following corrective action and completion date.

Corrective Action 6: ORD has up to date and accurate Grantee Research Project Results for all its active grants and has developed a policy and monthly report that verifies that

Grantee Research Project Results are updated within 120 days of the end of a grant project period. This will ensure that all active ORD grants have up to date and correct Grantee Research Project Results.

Planned Completion Date: July 1, 2020

Recommendation 7: Require all abstracts, reports, and publications for all Office of Research and Development research assistance agreements be placed on the EPA's website.

ORD Response: ORD concurs with this recommendation and proposes the following corrective action and completion date.

Corrective Action 7

ORD will ensure that abstracts and report summaries for ORD research assistance agreements will be uploaded on EPA's website within 120 days of the end of a grant project period.

Planned Completion Date: July 1, 2020

Attached please find specific comments on the Draft Report. We request the OIG include our full response to the Draft Report, including the attachment of detailed technical comments. If you have any questions regarding this response, please contact Kelly van Bronkhorst, Office of Research and Development, Office of Program Accountability and Resource Management at 202-566-2907.

OIG Response: We made the necessary changes to incorporate the technical comments into the final report. As a result, the ORD responded that the detailed technical comments no longer needed to be included as an attachment to the final report.

Attachment

cc: Heather Cursio
Mary Ross
Kathleen Deener
James Gentry
Maggie LaVay
Michael Hiscock
Yvonne Murphy
Michael Boucher
Kelly van Bronkhorst
Patrick Gilbride, OIG
Madeline Mullen, OIG

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