



OFFICE OF INSPECTOR GENERAL
U.S. ENVIRONMENTAL PROTECTION AGENCY

January 3, 2024

MEMORANDUM

SUBJECT: Notification:

Audit of the Brownfields Program Implementation of Justice40 Initiative Goals and Related Requirements for Infrastructure Investment and Jobs Act-Funded Projects
Project No. OA-FY24-0031

FROM: Khadija Walker, Director
Recycling, Cleanup, and Pollution Prevention Directorate
Office of Audit

TO: David Lloyd, Director
Office of Brownfields and Land Revitalization
Office of Land and Emergency Management

Theresa Segovia, Principal Deputy Assistant Administrator
Office of Environmental Justice and External Civil Rights

Faisal Amin, Chief Financial Officer
Office of the Chief Financial Officer

The U.S. Environmental Protection Agency Office of Inspector General plans to begin an audit of the Brownfields Program implementation of Justice40 Initiative goals and related requirements for IJIA-funded projects. This audit is part of the OIG's Infrastructure Investment and Jobs Act [oversight plan](#) for fiscal year 2023. This audit also addresses the following fiscal year 2024 [top management challenge](#) for the Agency: integrating and implementing environmental justice.

Our objective is to determine whether the EPA Brownfields program implemented Justice40 Initiative goals and related requirements for IJIA-funded projects. We will use applicable generally accepted government auditing standards to conduct our audit. The anticipated benefits of this audit include verifying the accuracy and informing the public of the EPA's Justice40 Initiative outcomes for the Brownfields program.

We will contact you to arrange a mutually agreeable time to discuss our objective. At that time, we can discuss any concerns that you may have and answer any questions about the audit process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the audit. Throughout the audit, we will provide updates on a regular basis.

To expedite our audit, we are requesting the following documentation prior to the entrance conference:

- EPA internal policies, guidance, and standard operating procedures related to the Brownfields program Justice40 Initiative implementation and reporting.
- Correspondence with Office of Management and Budget regarding its review and approval of the Brownfields program Justice40 Initiative benefits methodology and reporting.

We respectfully note that the Inspector General Act of 1978, as amended, authorizes the OIG to have timely access to personnel and all materials necessary to complete our objectives. Similarly, EPA Manual 6500, *Functions and Activities of the Office of Inspector General* (1994), requires that each EPA employee cooperate with and fully disclose information to the OIG. Also, Administrator Michael S. Regan, in a May 16, 2023, email to EPA employees, stated that the “agency and its employees have a duty to cooperate with OIG” and observed that “full engagement and collaboration between the OIG and EPA provides our agency with the opportunity to improve program performance and efficiency.” If an Agency employee or contractor refuses to provide requested materials to the OIG or otherwise fails to cooperate with the OIG, we will request that you immediately resolve the situation. Consistent with the Inspector General Act, we may report unresolved access matters to the administrator and to Congress.

We will post this memorandum on our public website at www.epaoig.gov. Anyone with knowledge of potential fraud, waste, abuse, misconduct, or mismanagement related to this audit should contact the OIG Hotline at (888) 546-8740 or via an electronic form on the “OIG Hotline” [webpage](#).

cc: Janet McCabe, Deputy Administrator

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