



**OFFICE OF THE ADMINISTRATOR**  
WASHINGTON, D.C. 20460

January 12, 2024

**MEMORANDUM**

**SUBJECT:** EPA Response to OIG Report titled “The EPA Should Determine How Its Elevation Policy Can More Effectively Address Risks to the Public” -- Report No. 23-P-0031, September 7, 2023.

**FROM:** Wesley J. Carpenter  
Deputy Chief of Staff for Management

**TO:** Sean O’Donnell  
Inspector General

Thank you for the opportunity to review and comment on the Office of Inspector General’s final report titled, “The EPA Should Determine How Its Elevation Policy Can More Effectively Address Risks to the Public. The OIG identified one unresolved issue on the EPA’s response to the April 27, 2023, draft report with the same title. The EPA notes that while Recommendation 2 is resolved with corrective action pending, Recommendation 1 remains unresolved. To reach common ground on the unresolved recommendation, we met with the project lead, Tim Roach, on November 14, 2023. We appreciated the meeting and subsequent dialogue to work through an amenable solution on Recommendation 1, EPA’s proposed corrective action, and alternative corrective action.

As conveyed in our response to the draft report, the EPA reaffirms its elevation policy did not derive from a statutory or regulatory mandate, Congressional inquiry or report, or an Executive Order or OMB directive. Furthermore, the subject policy is not a mutually exclusive concept, but another option or means for an employee to communicate an alleged or perceived environmental or public health concern or risk to agency senior leadership.

Recommendation 1 directs the Deputy Administrator to “Determine how the Policy on Elevation of Critical Public Health Issues can more effectively achieve its purpose of elevating public health and environmental risks that require higher levels of attention than the Agency’s usual processes could address.” While we may differ on the approach to addressing the OIG’s recommendation, the EPA maintains it has developed a viable course of action to ensure the elevation policy is an effective tool for employees to use on an as-needed basis.

The EPA expects elevation to be part of our normal communications. For clarity, we will begin using the phrase Report an Issue Tool/Elevation Policy when we refer to the matter identified in Recommendation 1. We trust this will enhance EPA’s overarching message on good communication/elevation while also emphasizing the availability of the Report an Issue Tool/Elevation Policy for its intended purposes. Additionally, we recommend taking more proactive steps to engage employees on the agency’s Report an Issue Tool/Elevation Policy. Specifically, the agency would increase its engagement with the workforce on the Report an Issue Tool/Elevation Policy by taking the following actions:

- Adding elevation/communication and Report an Issue Tool/Elevation Policy to the New Employee Orientation Agenda
- Highlighting EPA’s Expectation of Overall Elevation/Communication as well as the Report an Issue Tool/Elevation Policy at AO, NPM, and Regional All Staff Meetings Annually and/or As Needed
- Providing Report an Issue Tool/Elevation Policy Reminders to Employees via the EPA’s Weekly Newsletter
- Improving the Institutional Knowledge and Situational Awareness of EPA Managers and Supervisors on Elevation/Communication and the Report an Issue Tool/Elevation Policy Through Admin Updates Distributed by OCFO and OMS via Email.
- **Target Completion Date: September 30, 2024**

If you have any questions on this matter, please have your staff contact Michael Benton, Lead Audit Coordinator, Office of The Administrator, at [benton.michael@epa.gov](mailto:benton.michael@epa.gov) or (202) 564-2860.

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