



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

THE INSPECTOR GENERAL

May 30, 2023

MEMORANDUM

SUBJECT: Office of Inspector General Report No. 23-E-0013, *The EPA's January 2021 PFBS Toxicity Assessment Did Not Uphold the Agency's Commitments to Scientific Integrity and Information Quality*, issued March 7, 2023

FROM: Sean W. O'Donnell 

TO: Dan Utech
Chief of Staff
Office of the Administrator

Thank you for your May 5, 2023 memorandum responding to the final subject report. We look forward to working through the resolution process on these important issues. In our report, we clearly tie each recommendation to events surrounding the U.S. Environmental Protection Agency's January 2021 perfluorobutane sulfonic acid, or PFBS, toxicity assessment. Yet the Agency's blanket disagreement with the report's recommendations makes it difficult to discern the rationale for its disagreement with individual recommendations. Further, my staff contacted the responsible offices to schedule a meeting to discuss the report and its recommendations prior to your response, but the Agency declined to meet with them.

When policies and procedures are circumvented or otherwise not followed in letter or spirit, it is prudent to strengthen them. Clear and robust requirements not only serve those that intend to follow the rules but also deter bad actors or hold them to account. In the future, senior-level and political appointees may attempt to willfully circumvent the EPA's *Scientific Integrity Policy*, quality programs, and established intra-agency review and clearance processes. Strengthening mechanisms now to help avoid such actions or to report them to those with the necessary independence and authority to investigate violations will improve scientific integrity across the Agency. Moreover, the response points to the EPA's awareness from the outset that the actions by political and senior-level personnel were viewed as a violation of the *Scientific Integrity Policy* and political interference, and yet, no action was taken by the EPA's scientific integrity official nor was the violation and interference reported to the Office of Inspector General.

Again, we look forward to working with you on the resolution of the issues highlighted in our report. If you have any questions, please contact Paul Bergstrand, Assistant Inspector General for Special Review and Evaluation at Bergstrand.Paul@epa.gov.

cc: Chris Frey, Assistant Administrator and EPA Science Advisor, Office of Research and Development
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