




OFFICE OF INSPECTOR GENERAL
U.S. ENVIRONMENTAL PROTECTION AGENCY

May 31, 2024

MEMORANDUM

SUBJECT: Notification:
Evaluation of the EPA's Oversight of Authorized State Lead-Based Paint Programs
Project No. OSRE-FY24-0089

FROM: Gabby Fekete, Director 
Programs, Offices, and Centers Oversight Directorate
Office of Special Review and Evaluation

TO: Michal Ilana Freedhoff, Assistant Administrator
Office of Chemical Safety and Pollution Prevention

David Uhlmann, Assistant Administrator
Office of Enforcement and Compliance Assurance

The U.S. Environmental Protection Agency Office of Inspector General plans to begin an evaluation to review the EPA's oversight of authorized state lead-based paint programs. This evaluation is in response to a hotline complaint. This evaluation also addresses the following fiscal year 2024 top [management challenges](#) for the Agency: maximizing compliance with environmental laws and regulations, integrating and implementing environmental justice, and safeguarding the use and disposal of chemicals.

Our objective is to determine whether the EPA verifies that EPA-authorized state lead-based paint programs continue to meet regulatory requirements after initial authorization. We plan to conduct work within the Office of Enforcement and Compliance, the Office of Chemical Safety and Pollution Prevention, and select regional offices. We will conduct the evaluation using *Quality Standards for Inspection and Evaluation*, issued by the Council of the Inspectors General on Integrity and Efficiency. The anticipated benefits of this evaluation include improved oversight of EPA-authorized state lead-based paint programs. These programs are designed to protect human health, particularly for children and in communities with environmental justice concerns.

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 evaluation process, reporting procedures, methods used to gather and analyze data, and what we should expect of each other during the evaluation. Throughout the evaluation, we will provide updates on a regular basis.

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 evaluation should contact the OIG Hotline at (888) 546-8740 or via an electronic form on the “OIG Hotline” [webpage](#).

cc: Janet McCabe, Deputy Administrator

Dan Utech, Chief of Staff, Office of the Administrator

Wesley J. Carpenter, Deputy Chief of Staff for Management, Office of the Administrator

Jake Li, Deputy Assistant Administrator for Pesticide Programs, Office of Chemical Safety and Pollution Prevention

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