



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

OFFICE OF
INSPECTOR GENERAL

July 15, 2021

MEMORANDUM

SUBJECT: Notification of Audit:
Pollution Prevention Grants Reporting
Project No. OA-FY21-0225

FROM: Tina Lovingood, Director *Christina Lovingood*
Pollution Control and Cleanup Directorate
Office of Audit

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

The Office of Inspector General for the U.S. Environmental Protection Agency plans to begin an audit of the EPA's pollution prevention, or P2, grants reporting. This audit is being initiated to examine the accuracy of P2 grant results and how those results align with the P2 grant program's goals, as well as to follow-up on recommendations from the OIG's prior audit on the P2 program and to further assess the program's progress since 2015. This audit also addresses the following top management challenge for the Agency, as identified in our [EPA's FYs 2020–2021 Top Management Challenges](#) report, issued July 21, 2020: complying with key internal control requirements (data quality).

The OIG's objectives are to determine whether the EPA accurately reports the environmental results achieved from P2 grants and whether those results demonstrate alignment with the goals established for the program. Audit work will focus on the Office of Chemical Safety and Pollution Prevention, and we will consider conducting a limited number of grantee site visits. Applicable generally accepted government auditing standards will be used in conducting our audit. The anticipated benefits of this audit are improved accuracy in tracking results from P2 grants and reporting performance metrics to stakeholders.

We will contact you to arrange a mutually agreeable time to discuss our objectives. We would also be particularly interested in any areas of concern that you may have. We will answer any of your 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, please provide us the following information at or before our entrance conference:

1. Documentation of completed corrective actions from OIG Report No. [15-P-0276](#), *EPA Needs Accurate Data on Results of Pollution Prevention Grants to Maintain Program Integrity and*

Measure Effectiveness of Grants, issued September 4, 2015, including the certification memorandum.

2. Any training materials, guidance, and standard operating procedures used by headquarters or regional staff regarding their review of P2 grant applications or results reports.
3. Any P2 Grants Plus database training materials used by grantees or EPA staff.
4. P2 grant quality management plans for fiscal years 2018 and 2019.
5. Regional- and national-level P2 reported results for fiscal years 2018 and 2019.
6. Any regional P2 measurement guidance developed since 2015.

We respectfully note that the OIG is authorized by the Inspector General Act of 1978, as amended, to have timely access to personnel and all materials necessary to complete its 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 an April 28, 2021 email message to EPA employees, conveyed his “expectation that EPA personnel provide OIG timely access to records or other information” and observed that “full cooperation with the OIG is in the best interest of the public we serve.” We will request that you immediately resolve the situation if an Agency employee or contractor refuses to provide requested materials to the OIG or otherwise fails to cooperate with the OIG. We may report unresolved access matters to the administrator and include the incident in the *Semiannual Report to Congress*.

We will post this memorandum on our public website at www.epa.gov/oig.

cc: Janet McCabe, Deputy Administrator

Dan Utech, Chief of Staff, Office of the Administrator

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

Andrew LeBlanc, Agency Follow-Up Coordinator

José Kercado, Backup Agency Follow-Up Coordinator

Lindsay Hamilton, Associate Administrator for Public Affairs

Lance McCluney, Director, Office of Administrative and Executive Services, Office of the Administrator

Yvette T. Collazo, Director, Office of Pollution Prevention and Toxics, Office of Chemical Safety and Pollution Prevention

Janet Weiner, Senior Audit Liaison, Office of Chemical Safety and Pollution Prevention

Regional Audit Follow-Up Coordinators, Regions 1–10

Sean W. O'Donnell, Inspector General

Charles J. Sheehan, Deputy Inspector General

Edward S. Shields, Associate Deputy Inspector General

Benjamin May, Counsel to the Inspector General

Kellie J. Walker, Acting Deputy Chief of Staff, Office of Inspector General

Katherine Trimble, Assistant Inspector General for Audit

Helina P. Wong, Assistant Inspector General for Investigations

Jee Kim, Acting Deputy Assistant Inspector General for Management

Tom Collick, Deputy Counsel to the Inspector General

Susan Barvenik, Associate Deputy Counsel to the Inspector General
James Hatfield, Associate Deputy Assistant Inspector General for Audit
Jennifer Kaplan, Deputy Assistant Inspector General for Congressional and Public Affairs
Jeffrey Lagda, Congressional and Media Liaison, Office of Inspector General
Lori Hoffman, Congressional and Media Liaison, Office of Inspector General