



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

THE INSPECTOR GENERAL

September 30, 2021

**MEMORANDUM**

**SUBJECT:** Response to Planned Corrective Actions for Office of Inspector General  
Report No. 20-E-0333, *Improved EPA Oversight of Funding Recipients' Title VI  
Programs Could Prevent Discrimination*, issued September 28, 2020

**FROM:** Sean W. O'Donnell

A handwritten signature in blue ink that reads "Sean W O'Donnell".

**TO:** Melissa Hoffer, Acting General Counsel

Thank you for your September 20, 2021 memorandum, which outlines the U.S. Environmental Protection Agency's revised planned corrective actions and estimated milestone dates for the subject Office of Inspector General report. Based on the information and supporting documentation provided, the revised planned corrective actions meet the intent of the recommendations.

On November 27, 2020, your office provided us a memorandum outlining your response to Recommendations 2–6. Recommendation 1 was originally issued to the EPA's associate deputy administrator, and the remaining five recommendations were issued to the general counsel. Prior to providing the September 20, 2021 memorandum, Office of General Counsel managers coordinated with the OIG about the Office of General Counsel assuming responsibility for Recommendation 1. We agreed, and the Office of General Counsel provided corrective actions for Recommendation 1.

For Recommendation 1, the Office of General Counsel committed to developing and implementing guidance on permitting and cumulative impacts related to Title VI, including how cumulative impacts will be evaluated when assessing an action, policy, or practice. The office also committed to coordinating with the Office of the Administrator and other Agency programs and offices about the guidance.

For Recommendation 2, the Office of General Counsel committed to developing a plan for how it will conduct targeted systematic compliance reviews. The purpose of these compliance reviews is to determine whether funding recipients are in full compliance with Title VI requirements.

For Recommendation 3, we previously agreed that the Office of General Counsel's planned corrective actions met the intent of this recommendation, and according to the Office of General Counsel, the corrective actions have been implemented.

For Recommendation 4, the Office of General Counsel has revised its original response to state that it will recommend approving financial assistance, provided that the applicant has agreed, in writing, to have all requirements in place within six months.

For Recommendation 5, the Office of General Counsel stated that it commits to developing or updating policy, guidance, and standard operating procedures on data collection and use, as appropriate. It outlined additional steps to be taken, including revising Form 4700-4 and clarifying requirements. The Office of General Counsel's revised response provides estimated completion dates for this recommendation.

For Recommendation 6, the Office of General Counsel provided an estimated schedule and the completion dates for its corrective actions, which were missing in the previous response.

These six recommendations are now resolved with corrective actions pending. You should track implementation of the corrective actions in the Agency's audit tracking system until all actions are completed.

We will post this memorandum on our public website at [www.epa.gov/oig](http://www.epa.gov/oig).

cc: Dan Utech, Chief of Staff, Office of the Administrator  
Marianne Engelman-Lado, Deputy General Counsel for Environmental Initiatives  
Elise Packard, Deputy General Counsel for Operations  
Lilian Dorka, Director, External Civil Rights Compliance Office, Office of General Counsel  
Andrew LeBlanc, Agency Follow-Up Coordinator  
José Kercado, Backup Agency Follow-Up Coordinator  
Shan Anderson, Audit Follow-Up Coordinator, Office of General Counsel  
Charles J. Sheehan, Deputy Inspector General  
Edward S. Shields, Associate Deputy Inspector General  
Katherine Trimble, Assistant Inspector General for Audit  
Paul H. Bergstrand, Acting Assistant Inspector General for Special Review and Evaluation  
Laura B. Nicolosi, Principal Deputy Assistant Inspector General for Audit  
James Hatfield, Associate Deputy Assistant Inspector General for Audit  
Erin Barnes-Weaver, Acting Deputy Assistant Inspector General for Evaluation  
Renee McGhee-Lenart, Acting Director, Program Offices Centers Oversight Directorate, Office of  
Special Review and Evaluation