



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

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

March 11, 2022

MEMORANDUM

SUBJECT: Agreement on Revised Corrective Actions for Recommendations 5, 9, and 10 of the Office of Inspector General's Report, "*Staffing Constraints, Safety and Health Concerns at EPA's National Enforcement Investigations Center May Compromise Ability to Achieve Mission*," Report No. 21-P-0131, dated May 12, 2021

FROM: Lawrence E. Starfield, Acting Assistant Administrator

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LAWRENCE STARFIELD
Date: 2022.03.11
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TO: Sean O'Donnell, Inspector General
Office of the Inspector General

Thank you for the opportunity to respond to the recommendations in the Office of Inspector General's (OIG's) Report No. 21-P-0131, "*Staffing Constraints, Safety and Health Concerns at EPA's National Enforcement Investigations Center May Compromise Ability to Achieve Mission*," dated May 12, 2021. OECA and the OIG's team have been working cooperatively to achieve resolution on Recommendations 5, 9, and 10. On March 4, 2022, OECA received an email from James Kohler confirming that the proposed corrective actions below have been accepted by the OIG and will be considered resolved with corrective actions pending. With resolution on the remaining three recommendations, we believe OIG and OECA have reached agreement on all recommendations proposed in the report.

OECA appreciates the opportunity to respond to the report and reach resolution on the OIG's recommendations. If you have further questions, please contact Gwendolyn Spriggs, OECA's Audit Follow Up Coordinator, at spriggs.gwendolyn@epa.gov.

OIG Final Report Recommendation	OECA's Proposed Corrective Actions	Proposed Implementation Date
<p>5. Develop and incorporate metrics that address safety and health issues and staff concerns into National Enforcement Investigations Center senior management performance evaluations, such as collecting anonymous feedback from all staff annually.</p>	<p>a) NEIC senior management will create a multidisciplinary team consisting of laboratory management, the NEIC Safety Officer, and laboratory staff to conduct safety walk-throughs of the NEIC laboratory space on a monthly basis. The team will collaboratively identify deficiencies in the laboratory space, implement a metric to document the deficiencies, and address the deficiencies within 48 hours of the walk-through.</p> <p>b) The team will update NEIC senior management on a quarterly basis (or sooner, if necessary, to highlight any major issues) to discuss health and safety trends.</p> <p>Also, see corrective actions for Recommendation #s 9 and 10, which incorporate safety and health issues.</p>	<p>a) FY22 Q3</p> <p>b) FY22 Q4</p>
<p>9. Develop and incorporate metrics on the National Enforcement Investigations Center work environment and culture into Office of Criminal Enforcement, Forensics, and Training senior management performance standards, such as results from the annual Federal Employee Viewpoint Survey, periodic culture audits, or other methods to measure progress.</p>	<p>a) OECA/OCEFT will add a quarterly measure that evaluates the following topics: overall job satisfaction, understanding health and safety reporting procedures, level of comfort with reporting workplace concerns to management, general understanding of workplace priorities, and general understanding of customer demands.</p> <p>b) Measuring this baseline and subsequent quarterly data will continue until the completion of the organizational assessment that will evaluate the veracity of actual issues or concerns while also determining root causes of any concerns identified. Once that data is available, OCEFT will evaluate appropriate measures and/or next steps.</p>	<p>a) FY22 Q4</p> <p>b) FY24 Q3</p>

<p>10. Develop and incorporate metrics that address work environment and culture into National Enforcement Investigations Center senior management performance standards.</p>	<p>a) OECA/OCEFT will add a quarterly measure that evaluates the following topics: overall job satisfaction, understanding health and safety reporting procedures, level of comfort with reporting workplace concerns to management, general understanding of workplace priorities, and general understanding of customer demands.</p> <p>b) Measuring this baseline and subsequent quarterly data will continue until the completion of the organizational assessment that will evaluate the veracity of actual issues or concerns while also determining root causes of any concerns identified. Once that data is available, OCEFT will evaluate appropriate measures and/or next steps.</p>	<p>a) FY22 Q4</p> <p>b) FY24 Q3</p>
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