




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

THE INSPECTOR GENERAL

October 13, 2022

**MEMORANDUM**

**SUBJECT:** Response to Planned Corrective Actions for Office of Inspector General Report No. [22-E-0052](#), *The EPA Was Not Transparent About Changes Made to a Long-Chain PFAS Rule After Administrator Signature*, issued July 7, 2022

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

**TO:** Victoria Arroyo, Associate Administrator for Policy  
Office of the Administrator

Thank you for your September 2, 2022, memorandum which outlines the U.S. Environmental Protection Agency's planned corrective actions and estimated milestone dates for the unresolved recommendation (Recommendation 3) issued in the subject Office of Inspector General report. While we did not accept the planned corrective action for Recommendation 3 provided in your memorandum, further discussion via email has resulted in the Office of Policy providing a revised corrective action that we accept. The revised corrective action, which the Office of Policy proposes to complete by March 21, 2023, states:

"EPA will update the introductory Action Development Process training for EPA senior leadership to explicitly address post-signature changes to regulatory documents, the importance of documenting any verbal decisions and instructions that occur post-signature, and the need for adequate documentation and records management consistent with Executive Order 12866."

We agree that the revised planned corrective action meets the intent of our recommendation. This recommendation is now considered resolved. Recommendations 1 and 2 were, respectively, completed and resolved in our report. You should track implementation of EPA 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: William Nickerson, Director, Office of Regulatory Policy Management, Office of Policy  
Michael Benton, Audit Follow-Up Coordinator, Office of the Administrator  
Susan Perkins, Agency Follow-Up Coordinator  
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